#### IN THE SUPREME COURT OF THE STATE OF NEVADA

BARTHOLOMEW MAHONEY Appellant,

VS.

BONNIE MAHONEY Respondent.

Supreme Court No. 82 letars 24 dally Filed Sep 22 2021 11:05 a.m. District Court No. D Elizabeth AD Brown Clerk of Supreme Court

#### APPELLANT'S APPENDIX VOLUME II

#### AARON D GRIGSBY GRIGSBY LAW GROUP

A Professional Corporation Nevada Bar No. 9043 2880 W. Sahara Ave. Las Vegas, Nevada 89102 Phone: (702) 202-5235 aaron@grigsbylawgroup.com Counsel for Appellant

# KIMBERLY STUTZMAN Radford J. Smith, Chartered 2470 St. Rose Parkway Suite 206 Henderson, Nevada 89014 kstutzman@radfordsmith.com Counsel for Respondent

DOCUMENT	VOLUME	BATE
	NUMBER	NO(S)
Notice of Entry of Decree of Divorce	I	AA000001-12
Motion to Reduce Arrearages, Interest, and		
Penalties to Judgment; to Modify Alimony;		
to Review Child Support, for Sanctions and		
Attorney's Fees	I	AA000013-34
Schedule of Arrears	I	AA000035-43
General Financial Disclosure Form	I	AA000044-50
Notice of Hearing	I	AA000051
Certificate of Service	I	AA000052-53
Motion to Reduce Arrearages, Interest, and		
Penalties to Judgment; to Modify Alimony;		
to Review Child Support, for Sanctions and		
Attorney's Fees	I	AA000054-75
Schedule of Arrears	I	AA000076-84
General Financial Disclosure Form	I	AA000085-91
Notice of Hearing	I	AA000092
Defendant's Appendix of Exhibits to her motion	I	AA000093-145
Ex Parte Request for an Order to Continue Heari	ng I	AA000146-152

DOCUMENT	VOLUME	BATE
	NUMBER	NO(S)
Next as of Barahaduling of Hearing	I	AA000153-154
Notice of Rescheduling of Hearing  Certificate of Service	I	AA000155-156
Notice of Rescheduling of Hearing	I	AA000157-158
Notice of Entry of Order Granting Ex Parte Reques	st	
To Continue Hearing	I	AA000159-162
Certificate of Service	I	AA000163-164
Request for Submission of Motion Pursuant to		
EDCR 5.502	I	AA000165-188
Notice of Appearance of Counsel	I	AA000189-191
Opposition to Mo Motion to Reduce Arrearages, I	nterest, and	•
Penalties to Judgment; to Modify Alimony;		
to Review Child Support, for Sanctions and		
Attorney's Fees and Countermotion to Strike Mot	ion and	
For Attorney's Fees and Costs	I	AA000192-213
Notice of Entry of Order after August 22, 2019 H	earing I	AA000214-218

# **DOCUMENT** VOLUME

NUMBER NO(S)

BATE

Plaintiff's Reply in Support of her Motion to Reduce Arrearages, Interest, and					
Penalties to Judgment; to Modify Alimony; to Review C	hild S	upport, for			
Sanctions and Attorney's Fees	I	AA000219-236			
Updated Schedule of Arrears	I	AA000237-242			
General Financial Disclosure Form	II	AA000243-253			
Notice of Entry of Order after November 13, 2019	II	AA000254-259			
Affidavit of Service	II	AA000260-262			
Notice of Change of Law Firm Address	II	AA000263-264			
General Financial Disclosure Form	II	AA000265-276			
Motion to Withdraw	II	AA000277-284			
Notice of Hearing	II	AA000285			
Request for Submission	II	AA000286-288			
Notice of Entry of Order	II	AA000289-292			
Stipulation and Order to Continue Evidentiary Hearing	II	AA000293-297			
Notice of Rescheduling of Hearing	II	AA000298-299			
Certificate of Service	II	AA000300-301			
Amended Certificate of Service	II	AA000302-303			
Order Setting Evidentiary Hearing	II	AA000304-308			

Defendant's Pre-Trial Memorandum Defendant's List of Trial Exhibits	II II II II II II II II	NO(S)  AA000309-329  AA000330-333  AA000334-337  AA000338-341  AA000342-380  AA000381-388
Updated Schedule of Arrears  General Financial Disclosure Form  Notice of Entry of Findings of Fact,  Conclusions of Law, Order and Judgment From	II II	AA000330-333 AA000334-337 AA000338-341 AA000342-380
Defendant's Amended List of Trial Exhibits  Defendant's Second Amended List of Trial Exhibits  Updated Schedule of Arrears  General Financial Disclosure Form  Notice of Entry of Findings of Fact,  Conclusions of Law, Order and Judgment From	II	AA000334-337 AA000338-341 AA000342-380
Defendant's Second Amended List of Trial Exhibits Updated Schedule of Arrears General Financial Disclosure Form Notice of Entry of Findings of Fact, Conclusions of Law, Order and Judgment From	II	AA000338-341 AA000342-380
Updated Schedule of Arrears  General Financial Disclosure Form  Notice of Entry of Findings of Fact,  Conclusions of Law, Order and Judgment From	II	AA000342-380
General Financial Disclosure Form  Notice of Entry of Findings of Fact,  Conclusions of Law, Order and Judgment From		
Notice of Entry of Findings of Fact,  Conclusions of Law, Order and Judgment From	II	AA000381-388
Conclusions of Law, Order and Judgment From		
The December 3, 2020 Evidentiary Hearing		
	II	AA000389-454
Defendant's Memorandum of Fees, Costs, and		
Disbursements and Brunzell Declaration	II	AA000455-482
Notice of Entry of Order Granting Attorney's Fees		
And Costs	III	AA000483-498
Transcripts: December 3, 2020	III	AA000499-540

#### CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 21<sup>st</sup> day of September, 2021 a copy of the foregoing Appellant's Appendix Volume II was served as follows:

### BY ELECTRONIC FILING TO

Kimberly Stutzman, Esq Radford J. Smith, Chartered 2470 St. Rose Parkway Suite 206 Henderson, Nevada 89014 kstutzman@radfordsmith.com

> /s/Aaron Grigsby \_\_\_\_\_ Employee of The Grigsby Law Group

Electronically Filed 12/13/2019 10:31 AM Steven D. Grierson FDF CLERK OF THE COUR' Name: Aaion Gilgsby Address: 624 S 10th Street Las Vegas, Nevada 89101 Phone: (702) 202-5235 Email: aa1on@grigsbylawg1oup com Attorney for Plaintiff Nevada State Bar No. 9043 EIGHTH Judicial District Court CLARK COUNTY , Nevada Case No. D-13-477883-D BARTHOLOMEW MAHONEY Plaintiff, Dept. \$\_\_ BONNIE MAHONEY Defendant. GENERAL FINANCIAL DISCLOSURE FORM A. Personal Information: 1. What is your full name? (first, middle, last) Bartholomew Michael Mahoney 3. What is your date of birth? 06-10-66 2. How old are you? 53 4. What is your highest level of education? some college B. Employment Information: 1 Are you currently employed/ self-employed? (☐ check one) □ No If yes, complete the table below. Attached an additional page if needed. ✓ Yes Work Schedule Work Schedule Job Title Date of Hire Employer Name (days) (shift times) Mid-Mid VP of F&B 5 days 06-03-19 Resorts World Las Vegas 2 Are you disabled? (A check one) ☑ No If yes, what is your level of disability? ☐ Yes What agency certified you disabled? What is the nature of your disability? C. Prior Employment; If you are unemployed or have been working at your current job for less than 2 years, complete the following information. Prior Employer: Golden Entertainment Date of Hire: 05/16 Date of Termination 05/18 Reason for Leaving other

Page 1 of 8

#### Monthly Personal Income Schedule

#### A. Year-to-date Income.

As of the pay period ending 11-20-19 my gross year to date pay is 153,954 40

#### B. Determine your Gross Monthly Income.

Hourly Wage

\$132.21 \times \frac{40.00}{\text{Number of hours}} = \frac{\$5,288 \ 40}{\text{Weekly}} \times \frac{52}{\text{Weeks}} = \frac{\$274,996 \ 80}{\text{Annual}} \div \frac{12}{\text{Months}} \text{Months}	=	\$22,916 40 Gloss Monthly Income
---	---	----------------------------------

#### Annual Salary

Annual Income + 12 Solution   = \$0.00 Gioss Monthly Income		+	•	=	Gross Monthly
---	--	---	---	---	---------------

#### C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity of Trust Income			
Bonuses			
Car, Housing, or Other all	owance		
Commissions of Tips			
Net Rental Income			
Overtime Pay			
Pension/Retirement			
Social Security Income (S	SI)		
Social Security Disability	(SSD)		
Spousal Support	·		
Child Support			
Workman's Compensatio	n		
Other			
	Total Average Other Inco	me Received	\$0 00

	1
Total Average Gross Monthly Income (add totals from B and C above)	\$22,916 40
Total Average Gloss monthly mediae (and totals from D and O above)	4 4 4 4 4 4 4 4 4

#### D. Monthly Deductions

	Type of Deduction	Amount
1	Court Ordered Chrid Support (automatically deducted from paycheck)	
2	Federal Health Savings Plan	
3	Federal Income Tax	4,659.72
4	Amount for you.  Health Insurance For Opposing Party  For your Child(1en)	0 00
5	Life, Disability, or Other Insurance Premiums	42 46
6	Medicare	307.36
7	Retirement, Pension, IRA, or 401(k)	846.16
8	Savings	
9	Social Security	
10	Union Dues	
11.	Other (Type of Deduction)	
	Total Monthly Deductions (Lines 1-11)	5,855 70

#### Business/Self-Employment Income & Expense Schedule

Å.	Rus	iness	Inco	me:
£78.1	Duo.	111000	IIIV	'III'

What is your average	gross (pre-tax) mont	hly income/revenue from	self-employment or b	usinesses <sup>7</sup>
\$				

#### B. Business Expenses: Attach an additional page if needed

Type of Business Expense	Frequency	Amount	12 Month Average
Advertising			
Car and truck used for business		, ··, · · · · · · · · · · · · · · · · ·	
Commissions, wages or fees			
Business Entertainment/Travel			
Insurance			
Legal and professional			
Mortgage of Rent			
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and licenses (include est tax payments)			
Utilities			
Other			
	Total Average I	Business Expenses	0.00

Page 3 of 8

#### Personal Expense Schedule (Monthly)

A. Fill in the table with the amount of money you spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount I Pay	For Me	Other Party	For Both
Alimony/Spousal Support	·			
Auto Insurance	238 00			
Cai Loan/Lease Payment	706 00			
Cell Phone	230 00	√.		·
Child Support (not deducted from pay)	2,182,00	<u> </u>		
Clothing, Shoes, Btc	600 00			
Credit Card Payments (minimum due)	500 00			
Dry Cleaning	80 00	<b>✓</b>		
Electric	100 00	<b>/</b>		
Food (gioceries & restaurants)	500 00	✓		
Fuel	400 00	<b>✓</b>		
Gas (for home)				
Health Insurance (not deducted from pay)				
НОА				
Home Insurance (if not included in moitgage)				
Home Phone				· · · · · · · · · · · · · · · · · · ·
Internet/Cable	115 00	<b>√</b>		
Lawn Care				
Membership Fees	170.00	<b>✓</b>		
Mortgage/Rent/Lease	1,551 00	<b>√</b>		
Pest Control				
Pets	125 00	<b>✓</b>		
Pool Service				ļ
Property Taxes (if not included in mortgage)				
Security				
Sewei				<u> </u>
Student Loans				
Unreimbursed Medical Expense	70 00	/		
Water				<u> </u>
Other				<u> </u>
Total Monthly Expenses	7,567 00	1		

#### Household Information

A. Fill in the table below with the name and date of birth of each child, the person the child is living with, and whether the child is from this relationship Attached a separate sheet if needed.

	Child's Name	nild's Name Child's DOB		Is this child from this relationship?	Has this child been certified as special needs/disabled?		
1 <sup>sl</sup>	Brigitte Mahoney	10-29-01	mom	yes	no		
2 <sup>nd</sup>	Sophia Mahoney	06-12-04	mom	yes	no		
3 <sup>rd</sup>							
4 <sup>th</sup>							

B. Fill in the table below with the amount of money you spend each month on the following expenses for each child.

Type of Expense	1 <sup>st</sup> Child	2 <sup>nd</sup> Child	3 <sup>rd</sup> Child	4th Child
Cellulai Phone				
Child Care				
Clothing				
Education				
Entertainment		<u> </u>		
Extracurricular & Sports				
Health Insurance (if not deducted from pay)				
Summer Camp/Programs		<u> </u>	<del> </del>	
Transportation Costs for Visitation				
Um elmbursed Medical Expenses	<u> </u>	<u> </u>		
Vehicle	ļ			
Other,	360 00	460 00		
Total Monthly Expenses	360 00	460 00	0,00	0.00

C. Fill in the table below with the names, ages, and the amount of money contributed by all persons living in the home over the age of eighteen. If more than 4 adult household members attached a separate sheet.

Age	Person's Relationship to You (i.e. sister, friend, cousin, etc)	Monthly Contribution
	Age	

#### Personal Asset and Debt Chart

A. Complete this chart by listing all of your assets, the value of each, the amount owed on each, and whose name the asset or debt is under. If more than 15 assets, attach a separate sheet.

Line	Description of Asset and Debt Thereon	Gross Value		Total Amount Owed		Net Value	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	Ford F150	\$40,000.00	-	\$28,000.00	=	\$ 12,000.00	Mine
2.	401K	\$1,400.00	1	\$	=	\$ 1,400.00	Mine
3.		\$	7	\$	Ħ	\$ 0,00	
4.		\$	-	\$	=	\$ 0.00	,
5.		\$	-	\$	=	\$ 0,00	
6.		\$	-	\$	=	\$ 0.00	
7.		\$	-	\$	=	\$ 0.00	
8.		\$		\$	=	\$ 0.00	
9.		\$	-	\$	=	\$ 0.00	
10.		\$	-	\$	=	\$ 0.00	
11.		\$	-	\$	=	\$ 0.00	-
12.		\$	-	\$	11	\$ 0.00	
13.		\$ .	-	\$	11	\$ 0.00	
14.	•	\$	-	\$	Ŧ	\$ 0.00	
15.		\$	-	\$	=	\$ 0.00	
	Total Value of Assets (add lines 1-15)	\$41,400.00		\$28,000.00	=	\$ 13,400.00	

B. Complete this chart by listing all of your unsecured debt, the amount owed on each account, and whose name the debt is under. If more than 5 unsecured debts, attach a separate sheet.

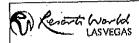
Line #	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
1.	Captial One	\$ 500.00	Mine
2.		\$	
3.		\$	
4.		\$	
5,		\$	
6.		\$	
Tota	al Unsecured Debt (add lines 1-6)	\$ 500.00	

#### CERTIFICATION

	1.	[ (have/have not) have	retained an attorney for this case.
	2.	As of the date of today, the attorney has been paid	
	3.	I have a credit with my attorney in the amount of \$	
	4.	I currently owe my attorney a total of \$	
	5.	I owe my prior attorney a total of \$	· ·
IMPOR	TANT:	Read the following paragraphs carefully and initial	each one.
	I guara	I swear or affirm under penalty of perjury the tions in completing this Financial Disclosure Form, antee the truthfulness of the information on this negly make false statements I may be subject to proceed the complete to proceed the complete to proceed the complete to proceed the complete the complete the complete to proceed the complete the	I understand that, by my signature, Form. I also understand that if I
	BM	_ I have attached a copy of my 3 most recent pa	ay stubs to this form.
	<u> </u>	_ I have attached a copy of my most rece statement to this form, if self-employed.	ent YTD income statement/P&L
		_ I have not attached a copy of my pay stubs to unemployed.	this form because I am currently
	Signatu	re	12-12-14 Date

#### CERTIFICATE OF SERVICE

I hereby declare under the penalty of perjury of the State of Nevada that the following is true and
correct.
That on (date) 12-13-19, service of the General Financial
Disclosure Form was made to the following interested parties in the following manner:
☐ Via 1st Class U.S. Mail, postage fully prepaid addressed as follows:
Via Electronic Service, in accordance with the Master Service List, pursuant to NEFCR 9, to:
Via Facsimile and/or Email Pursuant to the Consent of Service by Electronic Means on file
herein to:
Executed on the 13th day of Dec , 2019 Signature



Resorts World Las Vegas LLC 3000 Las Vegas Blvd South Las Vegas, NV 89109 Pay Statement
Period Start Date 11/07/2019
Period End Date 11/20/2019
Pay Date 11/29/2019
Document 2319
Net Pay \$7,670 28

						19 ,670 28
ay Details						
ARTHOLOMEW MAHONEY 890 RAFAEL RIVERIA WAY PT 1300 AS VEGAS, NV 89113	Employee Number SSN Job Pay Rete Pay Frequency	XXX-XXX-XXXX VP Food & Beverage \$132 2116 Brweekly	Location Resorts Wo Property RWLV - Rev Vegas Division 7 - Food an Area FOH - Fron		Faderal Income Tax NV State Income Tax NV State Income Ta	\$ 4 (Residence) \$ 4 x (Work) \$ 4
			Department 991 - Proje	ol-NV .		,,
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ARTHOLOMEW MAHONEY	Employee Nur	nber 700072	Pay Group Resorts We	orld Les Vegas	Federal Income Tax	S 4
890 RAFAEL RIVERIA WAY	SSN	XXX-XX-XXXX	Location Resorts W	orld Las Vegas	NV State Income Tax (Resid	ence) 8 4
PT 1300	Job	VP Food & Beverage		soria World Las	NV State income Tax (Work	) S·4 `
AS VEGAS, NV 80113	Pay Rate	\$132 2115	Vegas	•		
			Division 7 - Food ar	nd Beverage		
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		Yes	\$317 31	\$951 93	\$0.00	\$0.0
401(k)					\$0.00	\$0.0
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401(k) Match		Yes	\$0.00	\$0.00	\$158 68	
Group Term Life		No.	\$0.00	. \$0.00	\$28.85	\$288 5
Long Term Disab		No	\$0.00	\$0.00	\$12.31	\$123 1
Short Term Dis		. No	\$0.00	\$0.00	\$43.85	\$165 2
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Group Term Life		1					\$0.00	\$0.0	0.	\$168 66		\$317
401(k) Melch				Yes				\$0.0		\$28.85		\$259
Group Term Life				No			\$0.00			\$12.31		\$110
Long Term Disab				No			\$0 00 ·	\$0.0		\$43.85	. •	\$12
				No			\$0.00	. \$0.0		\$40.00		
Short Term Dis		•				<u> </u>	·	·			• ——	
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Federal Income Tax			•	•					\$153 67	٠.		\$1,94
Employee Medicare					•	٠,			\$580 63			\$6,23
Social Security Employee Tax				*			-					
Annual Annual Authority and a second				<u> </u>	<del></del>	_ <del> ,</del>	<u> </u>			. =-		. ':
n 17 0#			٠		٠,٠		Net Pay Dist	iribution				
Paid Time Off		<u> </u>				-	Annual Norm	her ·	Account	Туре.		Am
Plan	aken		Current			Balence	Account Num	AU1	Checking			\$7,1
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No records found	<u> </u>		• .						<u> </u>	De ductions		N
· ·			· :		FIT To	xable W	ages	Taxos	<u> </u>	Deductions		Ne
No records found		Gross 598 13			FIT TO	axable W		Taxos \$3,101 18	<del></del>	Deductions \$338 54 \$825 69		\$7,1 \$92,7

12/13/2019 11:08 AM Steven D. Grierson 1 NOEJ RADFORD J. SMITH, CHARTERED 2 KIMBERLY A. STUTZMAN, ESQ. 3 Nevada State Bar No. 014085 2470 St. Rose Parkway Suite 206 Henderson, Nevada 89014 Phone: (702) 990-6448; Fax: (702) 990-6456 Email: kstutzman@radfordsmith.com 6 Attorneys for Defendant DISTRICT COURT. 8 FAMILY DIVISION CLARK COUNTY, NEVADA 9 10 CASE NO.: D-13-477883-D BARTHOLOMEW M. MAHONEY, JR., DEPT NO.: S 11 Plaintiff, 12 VS. 13 BONNIE M. MAHONEY, 14 15 Defendant. 16 NOTICE OF ENTRY OF ORDER AFTER NOVEMBER 13, 2019 HEARING 17 PLEASE TAKE NOTICE that on the 13th day of December 2019, the Honorable 18 19 Vincent Ochoa entered an Order After November 13, 2019 Hearing, a copy of which is 20 attached hereto. 21 22 Date this 13th day of December, 2019. 23 RADFORD J. SMITH, CHARTERED 24 25 /s/ Kimberly A. Stutzman 26 KIMBERLY A. STUTZMAN, ESQ. 27 Nevada Bar No. 014085 2470 St. Rose Parkway, Suite 206 28 Henderson, Nevada 89074

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Electronically Filed

#### CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Radford J. Smith, Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. Under the Firm's practice, mail is to be deposited with the U.S. Postal Service on the same day as stated below, with postage thereon fully prepaid. I served the foregoing document described as "NOTICE OF ENTRY OF ORDER AFTER NOVEMBER 13, 2019 HEARING" on this 15th day of December 2019, to all interested parties as follows:

BY MAIL: Pursuant to NRCP 5(b), I placed a true copy thereof enclosed in a sealed envelope addressed as follows;

I transmitted a copy of the foregoing BY ELECTRONIC SERVICE: document this date via the Eighth Judicial District Court's electronic filing system;

Aaron D. Grigsby, Esq. THE GRIGSBY LAW GROUP 624 S. 10th Street Las Vegas, Nevada 89101 aaron@grigsbylawgroup.com

Employee of Radford J. Smith, Chartered

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Electronically Filed 12/13/2019 9:35 AM Steven D. Grierson

ORDR

RADFORD J. SMITH, CHARTERED KIMBERLY A. STUTZMAN, ESQ.

Nevada Bar No. 014085

2470 St. Rose Parkway, Suite 206

Henderson, Nevada 89074

Telephone: (702) 990-6448

Facsimile: (702) 990-6456

kstutzman@radfordsmith.com

Attorneys for Defendant

DISTRICT COURT CLARK COUNTY, NEVADA

11 BARTHOLOMEW M. MAHONEY, JR.,

CASE NO.: D-13-477883-D

Plaintiff,

Defendant.

VS.

FAMILY DIVISION

DEPT NO.: S

BONNIE M. MAHONEY,

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ORDER AFTER NOVEMBER 13, 2019 HEARING

DATE: November 13, 2019 TIME: 9:15 a.m.

This matter having come on for hearing on for a Return Hearing on Defendant's

Motion To Reduce Arrearages, Interest, And Penalties To Judgment; To Modify

Alimony; To Review Child Support, For Sanctions And Attorney's Fees And Costs

("Motion"); on Plaintiff's Opposition to Motion to Reduce Arrearages, Interest and

Penalties to Judgment, to Modify Alimony, to Review Child Support, for Sanctions and

RECEIVED

DEC 06 2019

DEPT. S

AA000256

Case Number: D-13-477883-D

Attorney's Fees and Costs and Countermotion to Strike Motion and for Attorney's Fees and Costs ("Opposition and Countermotion"); and on Defendant's Reply in Support of her Motion to Reduce Arrearages, Interest, and Penalties to Judgment; to Modify Alimony; to Review Child Support, for Sanctions and Attorney's Fees and Costs; Plaintiff, BARTHOLOMEW M. MAHONEY, JR., not present, but represented by his attorneys, Aaron Grigsby, Esq. of The Grigsby Law Group, and Defendant, BONNIE MAHONEY ("Bonnie"), present and represented by Kimberly A. Stutzman, Esq. of the law firm of Radford J. Smith Chartered, having heard the arguments of counsel, having reviewed the pleadings and papers on file in this matter, being fully advised in the premises, and good cause appearing therefore, makes the following findings and orders:

IT IS HEREBY ORDERED that an Evidentiary Hearing shall be schedule for May 7, 2019 at 1:30 PM for one-half day.

IT IS FURTHER ORDERED that the Court shall issue a Scheduling Order, which will be sent to counsel.

IT IS FURTHER ORDERED that Discovery is OPEN.

IT IS FURTHER ORDERED that the parties shall have 150 days to conduct discovery.

IT IS FURTHER ORDERED that Discovery shall CLOSE 45 days before the Evidentiary Hearing on March 23, 2020.

IT IS FURTHER ORDERED that Plaintiff shall file a Financial Disclosure Form (FDF) within 20 days of the November 13, 2019 hearing, which is due on Tuesday, December 3, 2019.

IT IS FURTHER ORDERED that within 30 days of the November 13, 2019 hearing, which is Friday, December 13, 2019, Plaintiff shall provide a list to Defendant of every banking institution, credit union, and money order he used to pay Defendant's alimony/spousal support, child support, and attorney's fees as outline in her Schedules of Arrears, filed on May 9, 2019 and on October 8, 2019.

IT IS FURTHER ORDERED that anything not list on the aforementioned list shall not be used as evidence at the Evidentiary Hearing.

IT IS FURTHER ORDERED that Defendant shall write to the Plaintiff regarding clarification on the bonuses.

IT IS FURTHER ORDERED that if Plaintiff does not cooperate, Defendant may subpoena the bonus records.

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IT IS FURTHER ORDERED that Defendant shall provide documentation to Plaintiff that she timely inquired about the bonuses.

IT IS SO ORDERED.

Dated this / day of September 2019.

DISTRICT COURT JUDGE

VINCENT OCHOA

Respectfully submitted by: RADFORD J. SMITH, CHARTERED

Nevada State Bar No. 014085

2470 St. Rose Parkway, Suite 200

Henderson, Nevada 89074

kstutzman@radfordsmith.com

Attorneys for Defendant

Approved as to form and conten THE GRIGSBY LAW GROUP

AARON D. GRÆGSBY, ESQ. Nevada State Bar No. 009043

624 S. 10th Street

Las Vegas, Nevada 89101 aaron@grigsbylawgroup.com Attorneys for Plaintiff

Steven D. Grierson 1 AOS RADFORD J. SMITH, CHARTERED 2 KIMBERLY A. STUTZMAN, ESQ. Nevada Bar No. 014085 3 2470 St. Rose Parkway, Suite 206 4 Henderson, Nevada 89074 5 Telephone: (702) 990-6448 Facsimile: (702) 990-6456 kstutzman@radfordsmith.com 7 Attorneys for Defendant 8 DISTRICT COURT 9 **FAMILY DIVISION** CLARK COUNTY, NEVADA 10 11 CASE NO.: D-13-477883-D 12 BARTHOLOMEW M: MAHONEY, JR., DEPT NO.: S 13 Plaintiff, 14 vs. 15 BONNIE M. MAHONEY, 16 17 Defendant. 18 19 AFFIDAVIT OF SERVICE 20 21 22 23 24 25 26 27

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1	AFFIDAVIT OF SERVICE
2	STATE OF <u>Nevada</u> )
3	OUNTY OF Clark )
4	
5	Richard Etienne, License # 1506, being duly sworn, says: that at all times herein affiant
6	was and is over 18 years of age, not a party to nor interested in the proceeding in which this
7	affidavit is made. That affiant received the Subpoena Duces Tecum & Witness Fee
8	Check on the 31st day of January 2020 and served the same on 31st day of January 2020
9	by delivering to JP Morgan Chase Bank c/o Karen Shaw at 1340 E Flamingo Rd. Las
10	Vegas Nevada 89119.
11	
12	I declare under penalty of perjury under the law of the State of Nevada that the foregoing is
13	true and correct,
14	EXECUTED this 2 <sup>nd</sup> day of February 2020.
15	ACC.
16	Richard Etienne # 1506
17	5940 S. Rainbow Blvd. Las Vegas NV 89118
18	No Notary Required per NRS 53.045
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CERTIFICATE OF SERVICE I hereby certify that I am an employee of Radford J. Smith, Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I served the foregoing Affidavit of Service on the of February 2020 to all interested parties as follows: BY ELECTRONIC SERVICE: I transmitted a copy of the foregoing document this date via the Eighth Judicial District Court's electronic filing system to: X AARON GRIGSBY, ESQ. 624 S. 10th Street Las Vegas, Nevada 89101 Attorneys for Plaintiff

An Employee of Radford J. Smith, Chartered

Electronically Filed 02/26/2020

CLERK OF THE COURT

NOTC

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Aaron D. Grigsby, Esq.

Nevada Bar No. 9043

The Grigsby Law Group

A Professional Corporation

2880 West Sahara Ave.

5 Las Vegas, Nevada 89102

Telephone: (702) 202-5235

Fax: (702) 944-7856

aaron@grigsbylawgroup.com

Attorney for Bartholomew Mahoney

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2880 West Sahara Ave. as Vegas, Nevada 89102 Tel: (702) 202-5235

The Grigsby Law Group

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DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

BARTHOLOMEW MAHONEY,

Plaintiff,

Case No. D-13-477883-D

VS.

Dept. No. S

BONNIE MAHONEY,

Defendant,

#### NOTICE OF CHANGE OF LAW FIRM ADDRESS

Please take notice that the Grigsby Law Group, Counsel for Plaintiff, has moved to 2880 West Sahara Avenue, Las Vegas, NV 89102. Please direct any future communication to the new address.

/s/Aaron Grigsby
Aaron Grigsby, Esq.
Nevada Bar No. 9043

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# CERTIFICATE OF SERVICE

I hereby certify that service of the Notice of Change of Law Firm Address was made on the 26th day of February, 2020, pursuant to NRCP 5(b) and pursuant to EDCR 8.05(2), EDCR 8.05(f) and Administrative Order 14-2, by mandatory electronic service through the Eighth Judicial District Court's electronic filing system or United States Mail to the following address.

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Kimberly A. Stutzman, Esq Radford J. Smith, Shartered 2470 St. Rose Parkway Ste. 206 Henderson, Nevada 89014 rsmith@radfordsmith.com kstutzman@radfordsmith.com

/s/ Jackson Newark

Employee of The Grigsby Law Group

FDF Name: RADFORD J. SM Address: 2470 St. Rose F Henderson NV 89074 Phone: (702) 990-6448 Email: kstutzman@radfo Attorney for Defendant Nevada State Bar No. C	ordsmith.com		3/24/	ronically Filed 2020 11:40 AM en D. Grierson RK OF THE COURT
	<u>Eighth</u>	Judicial District		
	Clark Co	ounty, N	evada	
Bartholomev	v M. Mahoney, Jr. Plaintiff,		e No. <u>D-13-477883-D</u>	
vs. Bonnie M. 1	Mahoney  Defendant.			
	GENERAL FI	NANCIAL DISCLO	SURE FORM	
<ul><li>2. How old are y</li><li>4. What is your</li><li>B. Employment Info</li><li>1. Are you curre</li></ul>	highest level of education? ormation: ently employed/ self-emplo	College Degree	)	
	·	mplete the table belo	ow. Attached an additi Work Schedule	Work Schedule
Date of Hire	Employer Name	JOD TINO	(days)	(shift times)
12/11/2019	Grill Concepts, Inc*	Reg. Sales Mgr	M-F	7a-3:30p
	abled? (Øcheck one) ☑ No □ Yes I V	f yes, what is your low What agency certifie What is the nature of	your disability?	
complete the fo	ent: If you are unemployed llowing information.	0/14	(10 Data of Tes	mination · 10/26/19
Prior Employer Reason for Lea	: Giggles N' Hugs ving: Poor working conditi	ons: unsanitary, safety	concerns for the childre	n playing, rodents

Rev. 8-1-2014 Page 1 of 8

#### **Monthly Personal Income Schedule**

#### A. Year-to-date Income.

As of the pay period ending 3/20/2020 my gross year to date pay is 15177.55

#### B. Determine your Gross Monthly Income.

Hourly Wage

	×		 \$0.00	×	52	=	\$0.00	÷	12		\$0.00
Hourly Wage		Number of hours worked per week	Weekly Income		Weeks		Annual Income		Months	-	Gross Monthly Income

#### Annual Salary

\$50,000.00 Annual Income	<b>÷</b>	12 Months	<b></b>	\$4,166.67 Gross Monthly Income
---------------------------------	----------	--------------	---------	---------------------------------------

#### C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses			
Car, Housing, or Other allowance:	Month	\$88.61	\$88.61
Commissions or Tips:	Varies	\$2,263.93	\$905.57
Net Rental Income:			
Flex Holiday	Monthly/Varies	\$84.61	\$84.61
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support			
Child Support	2x/Mo	\$1,091.00	\$1,091.00
Workman's Compensation			
Other: ER Cost of	Monthly	\$258.57	\$258.57
Total A	verage Other Income I	Received	\$2,428.36

	Total Average Gross Monthly Income (add totals from B and C above)	\$6,595.03
1	12000 12000 1200000 (1000 10000 1000 100	1 40,555105

# D. Monthly Deductions (Will supplement when pay stubs are available.)

	Type of Deduction	Amount
	Court Ordered Child Support (automatically deducted from paycheck)	
	Federal Health Savings Plan	0.15.00
•	Federal Income Tax	845.23
	Health Insurance  Amount for you: \$161.60  For Opposing Party: For your Child(ren): \$161.60	323.20
	Life, Disability, or Other Insurance Premiums	22.03
<u> 5</u>	Medicare IPA or 401(k)	
7	Retirement, Pension, IRA, or 401(k)	278.29
8	CA Tax	376.40
9	Social Security	60.70
10.	CASDI-E	60.00
11.	Other: (Type of Deduction) Cedar Sinal  Total Monthly Deductions (Lines 1-11)	1,965.85

# Business/Self-Employment Income & Expense Schedule

A.	Business Income:
	What is your average gross (pre-tax) monthly income/revenue from self-employment or businesses?
	\$
	1 114 and nage if needed

Expenses: Attach an additional pa		Amount	12 Month Aver
Type of Business Expense	Frequency		
Advertising			
Car and truck used for business			
Commissions, wages or fees			
Business Entertainment/Travel			
Insurance			
Legal and professional			
Mortgage or Rent			
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and licenses (include est. tax payments)			
Utilities			
Other:	Total Average	e Business Expenses	

# Personal Expense Schedule (Monthly)

A. Fill in the table with the amount of money you spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount I Pay	For Me	Other Party	For Both
Alimony/Spousal Support				
Auto Insurance	347.00	<b>/</b>		
Car Loan/Lease Payment	1,175.00	<b>/</b>		
Cell Phone Bonnie and 2 children	421.00			
Child Support (not deducted from pay)				
Clothing, Shoes, Etc	100.00	/		
Credit Card Payments (minimum due)	400.00			\ 
Dry Cleaning	40.00	/		
Electric	220.00	<b>/</b>		
Food (groceries & restaurants)	600.00	✓		
	200.00	✓		
Gas (for home)				
Health Insurance (not deducted from pay)				
HOA		<u> </u>		
Home Insurance (if not included in mortgage)				
Home Phone				
Internet/Cable	60.00	<b>√</b>		
Lawn Care				
	150.00	<b>✓</b>		
Membership Fees	1,500.00	✓		
Mortgage/Rent/Lease				
Pest Control	100.00	✓		
Pets				
Property Taxes (if not included in mortgage)				
Security				
Sewer				
Student Loans  It with housed Medical Expense				
Unreimbursed Medical Expense	80.00			
Water Other: Loans to Family	650.00			
Other: Loans to Fairing  Total Monthly Expenses	6,043.00			

#### **Household Information**

A. Fill in the table below with the name and date of birth of each child, the person the child is living with, and whether the child is from this relationship. Attached a separate sheet if needed.

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 <sup>st</sup>	Brigitte C. Mahoney	10-29-01	Dad	Yes	No
2 <sup>nd</sup>	Sophia J. Mahonet	6-12-04	Mom	Yes	No
3 <sup>rd</sup>					
4 <sup>th</sup>					

**B.** Fill in the table below with the amount of money you spend each month on the following expenses for each child.

Type of Expense	1 <sup>st</sup> Child	2 <sup>nd</sup> Child	3 <sup>rd</sup> Child	4 <sup>th</sup> Child
Cellular Phone		<b>-</b>		
Child Care				
Clothing	80.00	80.00		
Education	50.00	50.00		
	80.00	80.00		
Entertainment  Extracurricular & Sports	40.00	40.00		
Health Insurance (if not deducted from pay)				
Summer Camp/Programs	<u> </u>			
Transportation Costs for Visitation				
Unreimbursed Medical Expenses	200.00			
Vehicle				
Other:				0.00
Total Monthly Expenses	450.00	250.00	0.00	0.00

C. Fill in the table below with the names, ages, and the amount of money contributed by all persons living in the home over the age of eighteen. If more than 4 adult household members attached a separate sheet.

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc)	Monthly Contribution

# Personal Asset and Debt Chart

A. Complete this chart by listing all of your assets, the value of each, the amount owed on each, and whose name the asset or debt is under. If more than 15 assets, attach a separate sheet.

ne	whose name the asset or debt  Description of Asset and Debt  Thereon	Gross Value		Total Amount Owed		Net Value	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
		\$	<del>                                     </del>	\$		\$ 0.00	
$\cdot$			+_+	\$		\$ 0.00	
2.		\$	<del>                                     </del>	\$	=	\$ 0.00	
3.		\$	+-	\$	=	\$ 0.00	
4.		\$	+-	\$	<b>†</b> =	\$ 0.00	
5.		\$	- <del> </del> -	\$	1=	\$ 0.00	1.41.1 1.42.1 1.42.1
6.		\$	-	\$	=	\$ 0.00	
7.		\$	<del> -</del>	\$	<del> </del>	\$ 0.00	
8.		\$	<del>-   -</del>	\$	-	\$ 0.00	
9.		\$	+	\$	+		
10.		\$	<del>-   -</del>	T.	1:	= \$ 0.00	
11.		\$		<del></del>		= \$ 0.00	
12.		\\$		<del>                                     </del>		= \$ 0.00	
13.		\$		_ <del>  `                                   </del>	}-	= \$ 0.00	
14	<del> </del>	\$		-   \$		= \$ 0.00	
15	<del></del>	\$		- \\$			
13	Total Value of Assets (add lines 1-15)	\$ 0.00		- \$0.00		= \$0.00	

B. Complete this chart by listing all of your unsecured debt, the amount owed on each account, and whose name the debt is under. If more than 5 unsecured debts, attach a separate sheet.

ine	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
#		\$ 10,506.96	Bonnie
1.	Attorney's Fees  Loans to Lending Tree & Family	\$ 45,000.00	Bonnie
$\frac{2}{3}$	(Loans - John Lee, Frank Shipp, Brian	\$	
4.	Wheeler, and Parents)	\$	
5.	Wheeler, and ratemay	\$	
6.		\$	
	tal Unsecured Debt (add lines 1-6)	\$ 55,506.96	

# CERTIFICATION

1. 2. 3. 4. 5.	I (have/have not) have  As of the date of today, the attorney has been paid I have a credit with my attorney in the amount of I currently owe my attorney a total of \$5,506.96	Φ
BM	the short a conv of my 3 most recent	m. I understand that, by my signature, his Form. I also understand that if I o punishment, including contempt of t pay stubs to this form.  ecent YTD income statement/P&L
Sig	gnature	March 24, 2020  Date

#### CERTIFICATE OF SERVICE

I here	eby declar	e under	the penalty of perjui	y of the State of	Nevada that the fo	ollowing is true and
corre	ct:					
	That on	(date)	March 24, 2020		, service of the	General Financial
Discl	osure Fori	n was m	ade to the following	interested parties	in the following m	anner:
□v:	ia 1 <sup>st</sup> Class	s U.S. M	ail, postage fully pre	paid addressed as	s follows:	
			ce, in accordance w	ith the Master S	ervice List, pursuar	nt to NEFCR 9, to:
	98-0/,	1				
$\Box \mathbf{v}$	ia Facsimi	ile and/o	r Email Pursuant to	the Consent of	Service by Electro	onic Means on file
hereir	n to:					
Execu	ated on the	24(	lay of March	, 20 <u>20</u> .	/s/ Kimberly A. Stutzn	nan
					Signature	



6171 W Century Blvd Suite 360 Los Angeles, CA 90045 Direct Deposit Advice

Voucher Number 1494

paylocity

Check Date February 21, 2020

1102)				Amount
s, CA 90045		Direct Deposits Type	Account ***1595	1,575.65
		J.P. MORGANC		
IT VOUCHER		CHASE BA		1,575.65
		Total Direct Deposits	ar Calala	
	 102004	- shook - No	in Megotiable	

102004 756-5000-7666. 756017 1494 2767 102004

Bonnie Mahoney 1131 10 - 1115 15 1011 a check - Non Negotiable

507 Venado Vista Dr

La Crenda CA 20011 DIRECT DEPOSIT La Canada, CA 91011

# Non Negotiable - This is not a check - Non Negotiable

			Grill Conc	epts Services,	Earnings Statement				
Bonnie Maho Employee ID Location	756017 756-5000-7666 \$2,115.38	Fed Taxable Incomped Filing Status State Filing Status	6.0	Onto I Declaring	February 21, 2020 February 3, 2020 February 16, 2020	Voucher Number Net Pay	1,575.65		
Earnings Cell Phone Commissio Regular Gross Earning  Taxes CA CASDI-E FITW MED SS Taxes	Rate H	ours         Amount           0.00         36.92           80.00         2,115.38           80.00         2,152.30	147 443 8,461 9,052 Amount Y 86.05 344 21.52 9 279.43 1,14 31.21 13	.52 Deduction	ai ns eposits GAN CHASE BANK rect Deposits  Available Plan Y to Use 8.00 48.00		YTD 100.00 100.00 Amount 1,575.65 1,575.65		



Suite 360

Direct Deposit Advice

🕞 paylocity

Check Date

**Voucher Number** 

March 6, 2020

2292

DIRECT DEPOSIT VOUCHER

Los Angeles, CA 90045

Direct Deposits Type	Account	Amount
J.P. MORGANC CHASE BA	***1595	2,644.65

**Total Direct Deposits** 

2,644.65

La Canada, CA 91011

#### Non Negotiable - This is not a check - Non Negotiable

#### Grill Concepts Services, Inc

Bonnie Mal	ioncy	- ,	Earnings Statement
Employee ID Location Salary	756017 Fed Taxable Income 756-5000-7568 Fed Filing Status \$2,115.38 State Filing Status	3,972.71 Check Date March 6, 2020 S-0 Period Beginning February 17, 2020 S-0 Period Ending March 1, 2020	Voucher Number 2292 Net Pay 2,644.65
Earnings	Rate Hours Amount	YTD Deductions	Amount VTD

raut unaka	Rate	monts	Amount	110
Cell Phone		0.00	36.92	184.60
Commissio		0.00	1,820.41	2,263.93
ER Cost of		0.00	323,21	323.21
Flex Holid	26.44	8.00	211.52	211.52
Regular	26.44	72.00	1,903.86	10,365.20
Gross Earnin	25	80.00	3,972,71	13,025,25

Taxes	Amount	YTD
CA	268.75	609.68
CASDI-E	39.73	130.24
FITW	690.66	1,833,65
MED	57.60	188.87
SS	246.32	807.57
Taxes	1,303,06	3,570,01

Deductions	Amount	YTĐ	
Cedar Sinai	25.00	125.00 125.00	
Deductions	25.00		
Direct Deposits	Type Account	Amount	
J.P. MORGAN CHASE BANK, N.A.	C ***1595	2,644.65	
Total Direct Deposits	•	2,644.65	

	Available Pla	ın Year
Time Off	to Use	Used
Corporate	0.00	8.00
Salary	48.00	0.00
Vacation	0.00	0.00



6171 W Century Blvd Suite 360 Los Angeles, CA 90045

DIRECT DEPOSIT VOUCHER

Direct Deposit Advice

Check Date

Voucher Number 3079

paylocity

March 20, 2020

Amount Account Direct Deposits Type 1,575.65 \*\*\*1595 J.P. MORGANC

CHASE BA Total Direct Deposits

1,575.65

La Canada, CA 91011

102004 .756-5000-7568 756017 3079 5610 102004 S 1101 3 G 1000 Non Negatiable 507 Venado Vista Dr

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Non Negotiable - This is not a check - Non Negotiable

Grill Concepts Services, Inc

		<b>G</b>	•		Earnin	gs Statement
Bonnic Mahoney   Employee ID   756017   Location   756-5000-7568   Salary   \$2,115.38	Ped Taxable Income Fed Filing Status State Filing Status	2,152,30 S-0 S-0	Period Beginning	March 20, 2020 March 1, 2020 March 15, 2020	Voucher Number Net Pay	3079 1,575.65

<u>Farnings</u> Rate Cell Phone	Hours 0.00	<u>Amount</u> 36,92	YTD 221.52 2.263.93	Deductions         Amount         YTD           Cedar Sinai         25.00         150.00           Deductions         25.00         150.60           Type Account         Amount	'
Commissio ER Cost of	0.00	323.21	646.42	Direct Denosits	
Flex Holid			211.52 12,480 <u>.58</u>	J.P. MORGAN CHASE BANK, 13-24.	í
Regular 26.44	80,00	2,115.38		Total Direct Deposits	
Gross Earnings	80.00	2,152.30	15,177.55	Available Plan Year	
CHOST CATIONA			Amount YTD	Time Off to Use Used	

Gross Earnings	80,00	2,152,30		40,101,110		Available i
Taxes CA CASDI-E FITW MED SS	3000		Amount 86,05 21,52 279,43 31,21 133,44	YTD 695.73 151.76 2,113.08 220.08 941.01 4,121.66	Time Off Corporate Salary Vacation	0.00 0.00 48.00 0.00
Taxes			551.65	7,121.00		

#### Page 1 of 1 Check History Summary Report Grill Concepts Services, Inc (102004) Check History For: Mahoney, Bonnle[756017] 3/20/2020 Check Date To 2/7/2020 Check Date From \$8,249.82 Reg Pay 312.00 Reg Hours \$0,00 OT Pay 0.00 OT Hours \$2,789.11 Other Pay 8.00 Other Hours \$10,392.51 Gross Pay 320.00 Total Hours \$7,374.15 Net Pay \$3,833.63 Taxes \$5,795.95 Direct Deposit \$75.00 Deductions \$1,578.20 Net Check Amount Hours or Taxable Description \$5,795.95 0.00 Dir Dep 200171595 \$523.63 10,392.51 California SITW \$2.22 2,214.96 CA Edu & Training \$103.92 10,392.51 CA SDI - Employee \$79.74 2,214.96 California SUI \$75.00 0.00 Cedar Sinai \$1,820.41 0.00 Commission \$110.76 0.00 Cell Phone Allowance \$646.42 0.00 ER Cost of Medical \$1,520.79 10,392.51 Federal Income Tax \$211.52 8.00 Flex Holiday \$13.29 2,214.96 Fed Unemployment \$150.69 10,392.51 Medicare \$150.69 10,392.51 Medicare - Employer \$8,249.82 312.00 Regular \$644.33 10,392.51 OASDL \$644.33 10,392.51 OASDI - Employer User 1d: 736017 Run Date: 3/23/2020 Paylocity Corporation (847) 956-4850 Fax (847) 956-1926 PrintCheckHistorySummary.v1.00 Run Time: 6:27 PM

1 TOM Aaron D. Grigsby 2 Nevada Bar No. 9043 The Grigsby Law Group 3 A Professional Corporation 2880 West Sahara Ave, 5 Las Vegas, Nevada 89102 Telephone: (702) 202-5235 6 Facsimile: (702) 944-7856 aaron@grigsbylawgroup.com Attorney for Bartholomew Mahoney 8 9 DISTRICT COURT 10 FAMILY DIVISION 11 CLARK COUNTY, NEVADA 12 BARTHOLOMEW MAHONEY, 13 Case No. D-13-477883-D Plaintiff, 14 Dept. No. S vs. 15 BONNIE MAHONEY, 16 Defendant, 17 18 ORAL ARGUMENT REQUESTED: Yes No x 19 20 YOU ARE REQUIRED TO FILE A WRITTEN NOTICE 21 22 23

NOTICE YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK AND TO PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE.

MOTION TO WITHDRAW

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The Grigsby Law Group 2880 W. Sahara Ave, Las Vegas, Nevada 89102

Tel: (702) 202-5235

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COMES NOW, Plaintiff, Bartholomew Mahoney, by and through his counsel, Aaron D. Grigsby, Esq., of The Grigsby Law Group APC, and moves this Court for an Order allowing Aaron D. Grigsby, Esq., and the Grigsby Law Group to withdraw from representation of Plaintiff, Bartholomew Mahoney. This motion is made and based upon the Points and Authorities herein, the papers and pleadings on file in this matter and any oral argument which may be entertained at the time of the hearing on this matter.

## NOTICE OF MOTION

TO: Bonnie Mahoney, Defendant.

Kimberly A. Medina, attorney for Defendant YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE TO: that the undersigned will bring the foregoing Motion on for hearing before this court, on the \_\_\_\_\_ 2020, at the hour of  $\frac{N/A}{}$ .m., or May of

as soon thereafter as counsel may be heard. 18 April Dated this \_\_\_ day of Maxooh, 2020 19 20

> THE GRIGSBY LAW GROUP A Professional Corporation

/s/ Aaron Grigsby By: Aaron D. Grigsby, Esq. Bar No. 9043 624 S. Tenth Street, Las Vegas, Nevada 89101

# The Grigsby Law Group 2880 W. Sahara Ave, Las Vegas, Nevada 89102 Tel: (702) 202-5235

## MEMORANDUM OF POINTS AND AUTHORITIES

On August 8, 2019, Plaintiff retained the undersigned as legal counsel for purposes of responding to a Motion filed by Defendant on May 9, 2019. The retainer agreement required that the undersigned be retained forty-five (45) days prior to any trial scheduled in the above-referenced matter. Plaintiff has not been communicating with the undersigned for the past month. Additionally, he has not formally retained the undersigned for the upcoming evidentiary hearing.

SCR 46 provides in pertinent part:
The attorney in an action or special proceeding may
be changed at any time before judgment or final
determination as follows:

- 1. Upon consent of the attorney, approved by the client.
- 2. Upon the order of the court or judge thereof on the application of the attorney or client.

Additionally, Nevada Supreme Court Rule 166 states in relevant part:

Rule 166. Declining or terminating representation.

- 1. Except as stated in subsection 3, a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if:
  - (a) The representation will result in violation of the rules of professional conduct or other law;

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- mental physical or lawyer's The (b) impairs the materially condition the represent ability to lawyer's client; or
- The lawyer is discharged.
- subsection in stated as Except 2. lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if:
  - The client persists in a course of lawyer's the involving action services that the lawyer reasonably believes is criminal or fraudulent;
  - lawyer's the used has The client (b) crime services to perpetrate а fraud;
  - insists upon pursuing client A (c) objective that the lawyer considers repugnant or imprudent;
  - substantially fails client The (d) fulfill an obligation to the lawyer regarding the lawyer's services and reasonable given been that the lawyer will withdraw unless the obligation is fulfilled;
    - (e) The representation will result in an unreasonable financial burden on the rendered been has orlawyer unreasonably difficult by the client;
  - (f) Other good cause for withdrawal exists.

In the instant matter, Plaintiff has not been in Additionally, communication with the undersigned. Plaintiff was informed of the need to retain an expert and the probable cost associated with retention of said expert but has neither been in communication nor provided funds for to retain the

needed expert. Further, Plaintiff has not made scheduled payments towards the trial retainer. Given the current state of the attorney/client relationship, the undersigned does not believe that he can provide effective representation<sup>1</sup>.

#### CONCLUSION

The undersigned believes good cause exists for withdrawal in this matter.

Dated this 31st day of March, 2020.

The Grigsby Law Group
A Professional Corporation

/s/ Aaron Grigsby
Aaron D. Grigsby
Nevada Bar No. 9043
2880 W. Sahara Ave,
Las Vegas, Nevada 89102

<sup>&</sup>lt;sup>1</sup> The undersigned was contacted by Plaintiff and asked to withdraw from this matter.

# The Grigsby Law Group 2880 W. Sahara Ave, Las Vegas, Nevada 89102 Tel: (702) 202-5235

# DECLARATION OF AARON D. GRIGSBY, ESQ

- I, Aaron D. Grigsby, Esq., do hereby declare under penalty of perjury that the assertions of this Declaration are true and correct to the best of my knowledge. As for those assertions based on belief, I believe them to be true.
  - 1. That I am the attorney of record for Plaintiff in the above-referenced matter;
  - 2. That I am filing this Declaration in support of my Motion to Withdraw;
  - 3. That Plaintiff has not been responding to attempts at communication;
  - 4. That Plaintiff has been informed of the need to retain an expert but has not provided the funds for retention of the expert;
  - 5. That on March 31, 2020, the Plaintiff responded to an e-mail and requested that I withdraw;
  - 6. That your declarant believes that due to the current state of the attorney/client relationship, he is unable to continue representation.

FURTHER YOUR DECLARANT SAYATH NAUGHT

/s/ Aaron Grigsby Aaron D. Grigsby,

2880 W. Sahara Ave, as Vegas, Nevada 89102

### CERTIFICATE OF SERVICE

I hereby certify that service of the Motion to Withdraw was made on the 31<sup>st</sup> day of March, 2020, pursuant to NRCP 5(b) and pursuant to EDCR 8.05(2), EDCR 8.05(f) and Administrative Order 14-2, by mandatory electronic service through the Eighth Judicial District Court's electronic filing system or United States Mail to the following address.

Kimberly A. Stutzman, Esq Radford J. Smith, Shartered 2470 St. Rose Parkway Ste. 206 Henderson, Nevada 89014 rsmith@radfordsmith.com kstutzman@radfordsmith.com

/s/ Jackson Newark

Employee of The Grigsby Law Group

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

CLARK COUNTY, NEVADA
anholomen Mahoney Case No. D-13-471883-D
Plaintiff/Petitioner Mahoney Case No. 1-13-971783-1)  Dept
V. Royaie Mahorey MOTION/OPPOSITION FEE INFORMATION SHEET
Defendant/Respondent  Defendant/Respondent  Output  Defendant/Respondent  Output  Defendant/Respondent  Output  Defendant/Respondent  Output  Defendant/Respondent
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entered on (must specify) // October 10 17 17 September 10 17 S
Step 2. Select the \$0, \$129 or \$57 filing fee in the box below.  Step 2. Select the \$0, \$129 or \$57 filing filed with this form is not subject to the \$129 or the
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The Motion/Opposition being filed with the \$57 fee because:  The Motion/Opposition is being filed in a case that was not initiated by joint petition.  The Motion/Opposition is being filed in a case that was not initiated by joint petition.  The party filing the Motion/Opposition previously paid a fee of \$129 or \$57.  The party filing the Motion/Opposition previously paid a fee because it is a motion
The party fitting the start with this form is subject to the \$129 fee because it is a motion of the start with this form is subject to the start with the st
to mount to work.
OR- The Motion/Opposition being filing with this form is desperation.  The Motion/Opposition being filing with this form is desperation.
an opposition to a most has already paid a fee of \$129.
Step 3. Add the filing fees from Step 1 and Step 2.  The total filing fee for the motion/opposition I am filing with this form is;  The total filing fee for the motion/opposition I am filing with this form is;
The total filing fee for the motion 177
Date 3-31-20
Party filing Motion/Opposition: Pluntil Date 3-31-40
Signature of Party or Preparer

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2	CLARK COUNTY, NEVADA					
3	Bartholomew I	M Mahoney, Plaintiff	•	Case No.:	D-13-4778	883-D
4	VS.	oney, Defendant.		Departmen	t S	
5	Bolline M Mai	oney, Detendant.		- • P · · · · · · · · · · · · · · · · · ·		
6		<u>NC</u>	TICE O	F HEARING	•	
7						
8	Please be	advised that the Mo	tion to W	ithdraw in the	e above-enti	tled matter is set for
9	hearing as follo	ows:				
١	Date:	May 12, 2020				
10	Time:	No Appearance Re	equired			
11	Location:	Courtroom 07 Family Courts and	Services	Center		
13		601 N. Pecos Road Las Vegas, NV 89	1		<i>;</i>	
14	NOTE: Undo	NEECD O(d) if a	narty je	not receiving	electronic	service through the
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	-	serve this notice on				•
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17			STEVEN	D. GRIERS	ON, CEO/C	lerk of the Court
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19		By:	/s/ Jessic	a Castillo		
20			Deputy (	Clerk of the C	ouri	
21		CER	TIFICAT	E OF SERV	ICE	
22	I hereby certi	fy that pursuant to R	ule 9(b) c	f the Nevada	Electronic 1	Filing and Conversion
23	Rules a copy	of this Notice of He e Eighth Judicial Dis	aring was	electronically	y served to	an registered users of
	this case in th	e Eighth Judicial Dis	irici Cour	t Bicchoine i	IIIIG DJSter	••
24		By:	/s/ Jessic	a Castillo		
25		Ду. <sub>-</sub>	Deputy C	lerk of the Co	ourt	
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4/22/2020 2:18 PM
Steven D. Grierson
CLERK OF THE COURT

TOM 1 Aaron D. Grigsby Nevada Bar No. 9043 The Grigsby Law Group 3 A Professional Corporation 4 2880 West Sahara Ave, 5 Las Vegas, Nevada 89102 Telephone: (702) 202-5235 6 Facsimile: (702) 944-7856 7 aaron@grigsbylawgroup.com Attorney for Bartholomew Mahoney 8

DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

BARTHOLOMEW MAHONEY,

Plaintiff,

Case No. D-13-477883-D

vs.

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2880 W. Sahara Ave, Las Vegas, Nevada 89102 Tel: (702) 202-5235

Dept. No. S

BONNIE MAHONEY,

Defendant,

### REQUEST FOR SUBMISSION

NOW COMES, Aaron D. Grigsby, Esq., of the Grigsby Law Group APC, and hereby requests this Court to enter the proposed Order to Show Cause without a hearing pursuant to the Eighth Judicial District Court Rules<sup>1</sup>.

On April 1, 2020, the undersigned served
Defendant, Bonnie Mahoney by electronic service.
Additionally, on the same day, the undersigned served

<sup>1</sup> EDCR 2.23(b)

2728

The Grigsby Law Group 2880 W. Sahara Ave, Las Vegas, Nevada 89102 Tel: (702) 202-5235 Plaintiff, Bartholomew Mahoney by electronic service and by United States mail with the Motion to Withdraw. Any response was due on or before April 14, 2020. To date no Opposition to the undersigned's Motion to Withdraw has been filed.

The undersigned, requests that the Motion to Withdraw be submitted to the chambers of the Court for decision based upon the papers and pleadings on record and the proposed Order submitted contemporaneously with this pleading.

Dated this 22<sup>nd</sup> day of April, 2020

The Grigsby Law Group
A Professional Corporation

/s/ Aaron Grigsby
Aaron D. Grigsby
Nevada Bar No. 9043
2880 W. Sahara Ave,
Las Vegas, Nevada 89102
Telephone: (702) 202-5235

## CERTIFICATE OF SERVICE

I hereby certify that service of the Motion to Withdraw was made on the 22<sup>nd</sup> day of April, 2020, pursuant to NRCP 5(b) and pursuant to EDCR 8.05(2), EDCR 8.05(f) and Administrative Order 14-2, by mandatory electronic service through the Eighth Judicial District Court's electronic filing system or United States Mail to the following address.

The Grigsby Law Group 2880 W. Sahara Ave, Las Vegas, Nevada 89102 Tel: (702) 202-5235

Kimberly A. Stutzman, Esq Radford J. Smith, Shartered 2470 St. Rose Parkway Ste. 206 Henderson, Nevada 89014 kstutzman@radfordsmith.com

/s/ Jackson Newark

Employee of The Grigsby Law Group

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4/28/2020 1:19 PM
Steven D. Grierson
CLERK OF THE COURT

1 NEO Aaron D. Grigsby, Esq. Nevada Bar No. 9043 The Grigsby Law Group 3 A Professional Corporation 4 2880 W. Sahara Ave. Las Vegas, Nevada 89102 5 Phone: (702) 202-5235 6 Fax: (702) 944-7856 aaron@grigsbylawgroup.com 7 Attorney for Bartholomew Mahoney 8 9 DISTRICT COURT 10 FAMILY DIVISION 11 CLARK COUNTY, NEVADA 12

BARTHOLOMEW MAHONEY,

Plaintiff,

Case No. D-13-477883-D

VS.

Dept. No. S

BONNIE MAHONEY,

Defendant,

### NOTICE OF ENTRY OF ORDER

Please take notice an Order was entered on April 28, 2019. A copy of the Order is attached hereto.

Dated this 28th day of April, 2019.

THE GRIGSBY LAW GROUP
A Professional Corporation

/s/ Aaron Grigsby
Aaron D. Grigsby, Esq.

The Grigsby Law Group 2880 W. Sahara Ave Las Vegas, Nevada 89102 Tel: (702) 202-5235

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2880 W. Sahara Ave Las Vegas, Nevada 89102

The Grigsby Law Group

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### CERTIFICATE OF SERVICE

I hereby certify that service of the Notice of Entry of Order to was made on the 28th day of April, 2020 pursuant to NRCP 5(b) and pursuant to EDCR 8.05(2), EDCR 8.05(f) and Administrative Order 14-2, by mandatory electronic service through the Eighth Judicial District Court's electronic filing system.

Kimberly A. Stutzman, Esq Radford J. Smith, Shartered 2470 St. Rose Parkway Ste. 206 Henderson, Nevada 89014 rsmith@radfordsmith.com kstutzman@radfordsmith.com

Bartholomew Mahoney 7960 Rafael Rivera Way #300 Las Vegas, Nevada 89113

/s/ Jackson Newark

Employee of The Grigsby Law Group

s ungany Law Oloup 880 W. Sahara Ave, Vegas, Nevada 89102 icl: (702) 202-5235

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ORDR
Aaron D. Grigsby
Nevada Bar No. 9043
The Grigsby Law Group
A Professional Corporation
2880 West Sahara Ave,
Las Vegas, Nevada 89102
Telephone: (702) 202-5235
Facsimile: (702) 944-7856
aaron@grigsbylawgroup.com
8 Attorney for Bartholomew Mahoney

DISTRICT COURT

FAMILY DIVISION

CLARK COUNTY, NEVADA

BARTHOLOMEW MAHONEY,

Plaintiff,

Case No. D-13-477883-D

Dept. No. S

vs.

BONNIE MAHONEY,

Defendant,

### ORDER FOR WITHDRAWAL OF COUNSEL

This matter having come before this Honorable Court by way of submission to chambers, on the Motion to Withdraw filed by Aaron D. Grigsby, Esq.

The Court having reviewed the papers, and pleadings on file herein and for good cause appearing therefore:

THE COURT HEREBY FINDS that no response or opposition has been filed;

IT IS HEREBY ORDERED, ADJUDGED, and DECREED that Mr. Grigsby's Motion to Withdraw is granted;

TT IS HEREBY FURTHER ORDERED, ADJUDGED, and DECREED that Bartholomew Mahoney's's last known address for service of process is as follows:

7960 Rafael Rivera Way #300 Las Vegas, Nevada 89113

DATED this 27th day of April, 2020

DISTRICT COURT JUDGE

Submitted By:

Aaron D. Grigsby, Esq. Nevada Bar No. 9043 2880 W. Sahara Ave, Las Vegas, Nevada 89102

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5/4/2020 10:28 AM
Steven D. Grierson
CLERK OF THE COURT

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RADFORD J. SMITH, CHARTERED KIMBERLY A. STUTZMAN, ESQ.

Nevada Bar No. 014085

2470 St. Rose Parkway, Suite 206

Henderson, Nevada 89074

Telephone: (702) 990-6448

Facsimile: (702) 990-6456

kstutzman@radfordsmith.com

Attorneys for Defendant

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

BARTHOLOMEW M. MAHONEY, JR.,

Plaintiff,

vs.

BONNIE M. MAHONEY,

Defendant.

CASE NO.: D-13-477883-D

DEPT NO.: S

# STIPULATION AND ORDER TO CONTINUE THE EVIDENTIARY HEARING (First Request)

COME NOW Plaintiff, BARTHOLOMEW M. MAHONEY, JR., in proper person and Defendant, BONNIE MAHONEY, by and through Kimberly A. Stutzman, Esq. of the law firm of Radford J. Smith Chartered, who Stipulate and request entry of Order as follows:

1. That the evidentiary hearing currently scheduled on May 7, 2020 at 1:30 p.m. shall be continued to the Court's next available date at least sixty (60) days thereafter.

-1-

AA000293

Case Number: D-13-477883-D

2 3 4 5	<ol> <li>That the Pretrial Memorandum shall be filed and served ten days prior to the rescheduled the evidentiary hearing date.</li> <li>That Witness Lists and Exhibits shall be exchanged and provided to the Court for marking one week prior to the rescheduled evidentiary hearing date.</li> </ol>
6 7 8	IT IS SO STIPULATED.  Dated this _lst day of _May, 2020. Dated this _lst ay of _May, 2020.
9 10 11 12 13 14 15	RADFORD J. SMITH, CHARTERED   /s/ Kimberly Stutzman   /s/ BARTHOLOMEW M. MAHONEY JR.     KIMBERLY A. STUTZMAN, ESQ.   Nevada State Bar No. 014085   2470 St. Rose Parkway, Suite 200   Henderson, Nevada 89074   kstutzman@radfordsmith.com   Attorneys for Defendant   Plaintiff in Proper Person   Plaintiff in Proper Person
11	ORDER
	Having reviewed the foregoing superation in this matter shall be IT IS HEREBY ORDERED that the evidentiary hearing in this matter shall be
	rescheduled to the 29th day of October , 2020 at the hour of 1:30 p.m.  IT IS FURTHER ORDERED that the Pretrial Memorandum shall be filed and
	served ten days prior to the evidentiary hearing.

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IT IS FURTHER ORDERED that Witness Lists and Exhibits shall be exchanged and provided to the Court for marking one week prior to the evidentiary hearing.

IT IS SO ORDERED.

Dated this \_4th\_day of May

, 2020.

DISTRICT COURT JUDGE

уc

Respectfully submitted by:

RADFORD J. SMITH, CHARTERED

/s/ Kimberly Stutzman

KIMBERLY A. STUTZMAN, ESQ.

Nevada State Bar No. 014085

2470 St. Rose Parkway, Suite 200

Henderson, Nevada 89074

kstutzman@radfordsmith.com

Attorneys for Defendant

-3-

From: Kimberly Stutzman < kstutzman@radfordsmith.com>

Sent: Friday, May 1, 2020 4:06 PM

To: Bart Mahoney < bmmlv27@gmail.com>

Cc: Courtney Janson <cjanson@radfordsmith.com>

Subject: Re: Mahoney - Trial

Bart:

Thank you so much for the prompt response, agreeing to continue, and the very kind words and prayers.

Sincerely,

Kimberly A. Stutzman, Esq.† Radford J. Smith, Chartered 2470 St. Rose Parkway, Suite 206 Henderson, Nevada 89074 Phone (702) 990-6448 Facsimile (702) 990-6456

†Ms. Stutzman is also licensed in the State of California.

#### \*\*NOTICE\*\*

This message is intended for the use of the individual or entity to which it is addressed and may contain attorney/client information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by reply email or by telephone (702) 990-6448, and immediately delete this message and all its attachments.

On May 1, 2020, at 3:30 PM, Bart Mahoney < <a href="mailto:bmmlv27@gmail.com">bmmlv27@gmail.com</a>> wrote:

Kimberly, i am so sorry to hear about your daughter! She will be in my prayers. I wish her a speedy recovery!

Or course, we can ask for a stay

Sent from my iPad

Electronically Filed 9/17/2020 10:59 AM Steven D. Grierson CLERK OF THE COURT **NORH** 1 2 3 4 **DISTRICT COURT CLARK COUNTY, NEVADA** 5 6 CASE NO.: D-13-477883-D BARTHOLOMEW M MAHONEY, 7 **DEPARTMENT S PLAINTIFF** Courtroom 7 8 VS. BONNIE M MAHONEY, 9 DEFENDANT. 10 NOTICE OF RESCHEDULING OF HEARING 11 12 Please be advised that the date and time of a hearing set before the Honorable 13 Vincent Ochoa, has been changed. The Evidentiary Hearing, presently scheduled for the 29th day of October, 2020, at 1:30 PM, has been 14 rescheduled to the 3rd day of December, 2020, at 9:15 AM at the Family 15 Courts & Services Center, Courtroom 7. 16 17 **Honorable Vincent Ochoa** 18 19 By: /S/ Deniece Lopez 20 Judicial Executive Assistant Department S 21 22 23 24 25 26 27 28

VINCENT OCHOA DISTRICT JUDGE FAMILY DIVISION, DEPT. 8 LAS VEGAS, NV 89101

VINCENT OCHOA DISTRICT JUDGE FAMILY DIVISION, DEPT. S LAS VEGAS, NV 89101

Electronically Filed 9/28/2020 3:42 PM Steven D. Grierson CLERK OF THE COURT

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RADFORD J. SMITH, CHARTERED

RADFORD J. SMITH, ESQ.

Nevada Bar No. 002791

KIMBERLY A. STUTZMAN, ESQ.

Nevada Bar No. 014085

2470 St. Rose Parkway, Suite 206

Henderson, Nevada 89074

Telephone: (702) 990-6448

Facsimile: (702) 990-6456

kstutzman@radfordsmith.com

Attorneys for Defendant

DISTRICT COURT FAMILY DIVISION CLARK COUNTY, NEVADA

BARTHOLOMEW M. MAHONEY, JR.,

Plaintiff,

VS.

BONNIE M. MAHONEY,

Defendant.

CASE NO.: D-13-477883-D

DEPT NO.: S

### CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Radford J. Smith Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. Under the Firm's practice, mail is to be deposited with the U.S. Postal Service on the same day as stated below, with postage thereon fully prepaid.

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1	I caused the document described as "Notice of Rescheduling Hearing (filed
2	9/17/2020)" to be served on this 28th of September, 2020 to all interested parties as follows:
3	BY MAIL: Pursuant to NRCP 5(b), I placed a true copy thereof enclosed in a sealed envelope addressed as follows;
5	The foregoing of the foregoing
7	document this date via the Eighth Judicial District Court's electronic filing system;
9	BY CERTIFIED MAIL: I placed a true copy thereof enclosed in a sealed
10	envelope, return receipt requested, addressed as follows:
11 12	Bartholomew M. Mahoney 7960 Rafael Rivera Way #300
13	Las Vegas, Nevada 89113 Plaintiff in Proper Person
14	In Country or Tongon
15 16	/s/ Courtney Janson An Employee of Radford J. Smith, Chartered
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RADFORD J. SMITH, CHARTERED

RADFORD J. SMITH, ESQ.

Nevada Bar No. 002791

KIMBERLY A. STUTZMAN, ESQ.

Nevada Bar No. 014085

2470 St. Rose Parkway, Suite 206

Henderson, Nevada 89074

Telephone: (702) 990-6448

Facsimile: (702) 990-6456

kstutzman@radfordsmith.com

Attorneys for Defendant

DISTRICT COURT FAMILY DIVISION CLARK COUNTY, NEVADA

CASE NO.: D-13-477883-D

DEPT NO.: S

BARTHOLOMEW M. MAHONEY, JR.,

Plaintiff,

VS.

BONNIE M. MAHONEY,

Defendant.

AMENDED CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Radford J. Smith Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. Under the Firm's practice, mail is to be deposited with the U.S. Postal Service on the same day as stated below, with postage thereon fully prepaid.

I caused the document described as "Notice of Rescheduling Hearing (filed 9/17/2020)" to be served on this 28th of September, 2020 to all interested parties as follows: BY MAIL: Pursuant to NRCP 5(b), I placed a true copy thereof enclosed  $\boxtimes$ in a sealed envelope addressed as follows; BY ELECTRONIC SERVICE: I transmitted a copy of the foregoing document this date via the Eighth Judicial District Court's electronic filing system; BY CERTIFIED MAIL: I placed a true copy thereof enclosed in a sealed envelope, return receipt requested, addressed as follows: Bartholomew M. Mahoney 7960 Rafael Rivera Way #300 Las Vegas, Nevada 89113 Plaintiff in Proper Person /s/ Courtney Janson An Employee of Radford J. Smith, Chartered 

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CASE NO. D-13-477883D

DEPT. S

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### **DISTRICT COURT CLARK COUNTY, NEVADA**

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## ORDER SETTING EVIDENTIARY HEARING

## TO COUNSEL AND LITIGANTS IN PROPER PERSON:

This order sets forth critical dates and times for the major proceedings in this case. It is the responsibility of the attorneys, or the litigants (when appearing in proper person), to meet the deadlines and to appear for the following required proceedings:

### IS HEREBY ORDERED THAT:

BARTHOLOMWE M. MAHONEY, PLAINTIFF

BONNIE M. MAHONEY, DEFENDANT

The above entitled case is set for an Evidentiary Hearing to begin on the 3rd day of December, 2020 at 9:15 AM (Stack #1). The hearing will be held in Department S, Courtroom 7 located at the Family Court and Services Center, 601 N Pecos Road, Las Vegas, Nevada 89101. If either Party requires an interpreter, it is the responsibility of that Party to make arrangements for the interpreter at the Party's expense. The number for the Interpreter's Office is (702) 455-1878.

A Pre-trial Memorandum may be filed SEVEN DAYS (7 judicial) days before the trial date and a courtesy copy must be delivered to Department S Chambers. All parties, attorneys and parties in proper person MUST comply with ALL REQUIREMENTS of E.D.C.R. 2.68, 2.69, and 5.87. With the Prehearing Memorandum, the parties may submit a proposed order with law and

VINCENT OCHOA DISTRICT IUDGE FAMILY DIVISION, DEPT.S LAS VEGAS, NV 89101-2408

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findings of fact supporting each issue they wish the Court to address. The proposed order may be filed separately or as an attachment to the Pre-hearing Memorandum.

If any of the following deadlines need to be adjusted, the Parties shall contact the Court within TEN (10) days of this order or file a separate stipulation and order modifying these deadlines.

#### **Discovery Plan**

IT IS FURTHER ORDERED THAT: TWENTY (20 calendar) days before the Trial, Discovery shall close.

IT IS FURTHER ORDERED THAT: the Parties shall participate in the discovery process in good faith and may utilize all discovery methods provided in NRCP 26 through NRCP 36. Each Party shall provide to the other Party the required disclosures provided in NRCP 16.2 (b).

#### **Non-Expert Witness**

IT IS FURTHER ORDERED THAT: within FIFTEEN DAYS (15 calendar) days of this Order, the Parties shall provide the other side a list of witnesses that include list of names, the address and telephone numbers of each individual(s) who are likely to possess discoverable information regarding this action, or who may be called as a witness at any stage of the proceeding including for impeachment or rebuttal. The Parties must identify the subject of the information for which the individual may be called. Witnesses can be added to the list of witnesses until TWENTY (20 calendar) days before the end of discovery.

#### **Documents**

IT IS FURTHER ORDERED THAT: a copy of each document or exhibit, including summaries of evidence which Party expects to offer as evidence at the hearing in any manner shall be provided to the other Party at least TWENTY DAYS (20 calendar) days before the end of discovery. Failure to provide timely the list of documents/exhibits and list of witnesses may result in

documents/exhibits or witnesses not listed being excluded from evidence or other appropriate court-imposed sanctions against counsel or party in proper person.

IT IS FURTHER ORDERED THAT: any objection to the authenticity or genuineness of documents is to be made in writing within (21 calendar) days of the date the receiving Party receives them. Absent such an objection, the document shall be presumed authentic and genuine and shall not be excluded from evidence on these grounds NRCP 16.2.

#### **Disclosure of Expert Witness and Testimony**

IT IS FURTHER ORDERED THAT: A party shall disclose to other parties the identity of any person who may be used at the hearing to present evidence under NRS 50.275, 50.285, and 50.305. These disclosures must be made within 30 days after the initial financial disclosure form is required to be filed and served under Rule 16.2(b)(2) or, if the evidence is intended solely to contradict or rebut evidence on the same subject matter identified by another party, within 21 days after the disclosure made by the other party. The parties shall supplement these disclosures when required under Rule 26(e)(1).

Except as otherwise stipulated or directed by the court, a party who retains or specially employs a witness to provide expert testimony in the case, or whose duties as an employee of the party regularly involve giving expert testimony, shall deliver to the opposing party a written report prepared and signed by the witness 60 days before the close of discovery. The court, upon good cause shown or by stipulation of the parties, may extend the deadline for exchange of the expert reports or relieve a party of the duty to prepare a written report in an appropriate case. The report shall contain a complete statement of all opinions to be expressed and the basis and reasons therefor, the data or other information considered by the witness in forming the opinions, any exhibits to be used as a summary of or support for the opinions, and the qualifications of the witness.

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	(1)Typed Exhibit lists with all stipulated exhibits marked;
:	(2)All exhibits marked by counsel for identification purposes; bound,
3	tabbed and
	individually page numbered. Plaintiff must use numbers to tab their
;	exhibits;
5	Defendants must use letters to tab their exhibits;
,	(3)List of depositions;
J	(4)List of equipment needed for trial, including audiovisual equipment; and
3	(5)Courtesy copies of any legal briefs on hearing issues.
)	Parties are advised that they should provide two additional sets of exhibits
)	at the day of hearing: one for the judge and one for the witness stand. These
	sets must be brought on day of hearing. DO NOT ATTACH EXHIBITS TO
2	PRE-HEARING MEMORANDUMS.
}	The Exhibit List and Witness List must be filed with the Court SEVEN
ŀ	DAYS (7 judicial) days after the close of discovery.
5	If any deadline in this order falls on a non-judicial day, the deadline will be
5	extended to the next judicial day.
,	Failure of the designated hearing attorney or any party appearing in
	proper person to appear for any court appearances or to comply with this
}	Order may result in any of the following: (1) dismissal of the action; (2) default
)	judgment; (3) monetary sanctions;
)	(4) vacation of hearing date; and/or any other appropriate remedy or sanction.
	Counsel must advise the Court immediately when the case settles or is
2	otherwise resolved prior to the hearing.
}	ORDERS SHORTENING TIME WILL NOT BE SIGNED EXCEPT IN
Ļ	EXTREME EMERGENCIES. An upcoming hearing date is not an EXTREME
;	EMERGENCY.
5	IT IS FURTHER ORDERED: that no continuances will be granted to
7	either party unless written application is made to the Court, served upon

1	opposing coupsol, and a hooring is hold at least course (7 to the bull at least					
2	opposing counsel, and a hearing is held at least seven (7 judicial) days prior to the time of hearing.  If this matter settles, please advise the Court as soon as possible.					
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5	DATED: 10-2-2020					
6	Vincent Ochoa					
7	VINCENT OCHOA					
8	District Court Judge DEPARTMENT S					
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10						
11	CERTIFICATE OF SERVICE					
12	On the above file stamped date a copy of the foregoing Order Setting Non-Jury					
13	Trial was:					
14						
15	☐ Delivered in open court					
16	☐ Placed in the appropriate attorney folder(s) at the Family Court or E-served					
17	pursuant to NEFCR 9.  Mailed, postage fully prepaid, to					
18						
19	Kimberly A. Stutzman, Esq.					
20	Bartholomew M. Mohoney, Jr.					
21	7960 Rafael Rivera Way #300					
22	Las Vegas, NV 89113					
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VINCENT OCHOA DISTRICT JUDGE FAMILY DIVISION, DEPT.S LAS VEGAS, NV 89101-2408

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**PMEM** 

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Attorneys for Defendant

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

BARTHOLOMEW M. MAHONEY, JR.,

Plaintiff,

vs.

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BONNIE M. MAHONEY,

Defendant.

CASE NO.: D-13-477883-D

DEPT NO.: S

## **DEFENDANT'S PRE-TRIAL MEMORANDUM**

Date of Trial: December 3, 2020 Time of Trial: 9:15 a.m.

TO: BARTHOLOMEW MAHONEY, Plaintiff; and

Defendant, BONNIE MAHONEY ("Bonnie"), by and through her attorneys,

Kimberly A. Stutzman, Esq. of the law firm of RADFORD J. SMITH, CHARTERED, and

hereby submits her Pre-Trial Memorandum.

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### STATEMENT OF ESSENTIAL FACTS

#### A. NAMES AND AGES OF THE PARTIES

Plaintiff, BARTHOLOMEW MAHONEY ("Bart"), age 54.

Defendant, BONNIE MAHONEY ("Bonnie"), age 49.

#### B. DATE OF DECREE OF DIVORCE

The parties were divorced by stipulated Decree of Divorce ("Decree") filed February 3, 2016.

### C. CHILDREN AT ISSUE AND BIRTH DATES

The parties have two minor children, BRIGITTE MAHONEY ("Brigitte"), born October 29, 2001 (age 19), and SOPHIA MAHONEY ("Sophia"), born June 12, 2004 (age 16).

## D. RESOLVED ISSUES, INCLUDING AGREED RESOLUTION

Nevada has both personal and subject matter jurisdiction.

#### E. STATEMENT OF UNRESOLVED ISSUES

1. Bonnie's Request to sanction Bart for his willful violation of the parties' Decree for nonpayment of Child Support, Alimony, Defendant's portion of Plaintiff's bonuses, and Attorney's Fees due under the Decree.

- 2. Bonnie's Request to Reduce Child Support Arrearages, Interest, and Penalties to Judgment;
- 3. Bonnie's Request to Reduce Unpaid Alimony and Property Settlement Payment to Judgement; and
- 4. Bonnie's request for attorney's fees and costs as a result of this post-Decree action.

II.

## POINTS AND AUTHORITIES

As of the date of this memorandum, Bart failed to pay Bonnie the full amounts due under the parties' stipulated Decree. He also fails to dispute that he should not be sanctioned. Bart failed to timely provide *any* documents. Bonnie was forced to subpoena Bart's bank and employment records. At trial, Bonnie will demonstrate that Bart should be sanctioned for this nonpayment of Child Support, Alimony, Attorney's Fees, and Bonuses to Bonnie. Combined, Bart owes Bonnie more than \$115,965.25 (because some of this does not include interest as discussed below. Because Bart does not pay her the proper amount of support, she can barely meet her own expenses<sup>1</sup>.

As discussed above, the parties have two children, BRIGITTE MAHONEY ("Brigitte"), born October 29, 2001 (age 19), and SOPHIA MAHONEY ("Sophia"), born

<sup>&</sup>lt;sup>1</sup> Bonnie has had to use credit cards and essentially liquidate accounts to simply maintain her expenses. She has also had to borrow money from her parents, cousins, god brother, and friends.

June 12, 2004 (age 16). (Brigitte was a minor when Bonnie initially filed her motion and has since emancipated.)

Pursuant to the parties' Decree, they share joint legal custody. Bonnie was granted primary physical custody of the children subject to Bart specific visitations. The parties also agreed that Bonnie could relocate to California with the children. They lived in California since the parties' divorce. Bonnie currently lives in Pasadena, California. Brigitte moved to Las Vegas to attend UNLV.

## 1. Bart's Failure to Pay Bonnie Child and Spousal Support

The Decree obligates Bart to pay Bonnie child support in the amount of \$1,091 per child per month, for a total of \$2,182 per month. See Decree of Divorce, page 5, line 8. One-half of the total amount of child support is due on the 5<sup>th</sup> of each month, and the remaining half is due by the 25<sup>th</sup> of each month. See Decree, page 5, line 10.

The Decree also obligates Bart to pay Bonnie spousal support in the amount of \$2,668 per month for four (4) years beginning September 1, 2015. See Decree, page 6, line 26. One-half of the total amount of child support is due on the 5<sup>th</sup> of each month, and the remaining half is due by the 25<sup>th</sup> of each month. See Decree, beginning page 6, line 28.

Bart failed to timely or fully paid his obligations to Bonnie. Rather than pay the total amount due prior to the 5<sup>th</sup> and 25<sup>th</sup> of each month, Bart pays Bonnie sporadically. Bonnie, however, has kept a record of the total amount received each month. *See* Updated Schedule of Arrears, filed separately.

Bart, however, electronically transfers funds to Bonnie. Because he did not specify what the amounts are for, Bonnie kept a record of the total amount due, \$4,850, and the total amount received that month. *Id*.

From September 2015 through to the present, Bart generally pays less than the amount that he owes. Bonnie submits that Bart's late payment of support causes him to be subject to the statutory penalty until the penalty expired on January 31, 2020 pursuant to the new Child Support Guidelines in NAC 425. Those penalties are calculated through January 31, 2020 as part of Bonnie's Schedule of Arrearages. *Id.* 

Bonnie routinely requests that Bart pay timely and in full. Bart refuses. See Examples of Communication from Bonnie to Bart, which will be presented at trial. When she has asked for full payments, Bart claims he has paid more than the amount due for other months. This, however, is not true. If Bart has paid more than the \$4,850, it was either for payments towards his arrears or for his share of the children's school registration or book fees, which Bonnie and the girls begged Bart to pay. Other than the few payments in excess of \$4,850, he has not paid anything else toward the arrearages, interest, and statutory penalties that accrued when he paid late or failed to pay at all. See Schedule of Arrears, filed separately. The interest and penalties that Bart owes related to his delinquencies in support are calculated in Bonnie's Schedule of Arrearages. The interest is calculated at the legal rate(s). The mandatory statutory penalty under NRS 125B.095 is calculated at 10 percent per annum after 30 days of delinquency.

## 2. Bart's Failure to Pay Bonnie's Attorney Fees

Bart is delinquent on other payments he is required to make under the Decree. The Decree obligates Bart to reimburse Bonnie attorney fees in the amount of \$10,000. Bart is to pay Bonnie \$555 per month for the attorney fees directly until paid in full. *See* Decree, page 7, line 10.

Bart failed to make these payments to Bonnie. As of the date of this Motion, the Attorney Fees should be paid in full. Because Bart did not pay his attorney fee payments timely, he is subject to interest calculated at the legal interest rate. Bonnie subpoenaed Bart's bank records. Upon a thorough and time-consuming review, she confirmed that Bart paid a portion of the fees as a result of a note in his transfer. Again, because Bart was making electronic transfers, it was difficult to initially discern what the transfer was for.

The payments commenced September 2015 in the amount of \$555 per month until the \$10,000 was paid in full in March 2017. Bart paid as follows:

- \$555 in November 2015, December 2015, and January 2016.
- \$1,030 in Mach 2016.
- \$550 in April 2016.
- \$1,100 in August 2017
- \$550 in November 2017

As a result, Bart paid Bonnie \$4,895 towards the \$10,000. Bart still owes Bonnie \$5,105. Bart also owes \$1,523.78 in interest. As set forth in the analysis of the attorney fee arrearages, Bart owes \$6,628.78. See Schedule of Arrears.

## 3. Bart's failure to pay a portion of his Bonuses to Bonnie

The Decree orders Bart to pay Bonnie her portion of his bonuses each year. He failed to do so. The Decree states in relevant part —

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Dad receives bonuses annually and it is agreed that Dad shall pay Mom twenty-five percent (25%) of the after-tax amount of the bonus for a period of four years, commencing September 1, 2015. For tracking purposes, Dad shall provide Mom with a copy of his W-2 forms annually. If Dad does not provide his W-2 forms to Mom by April 15<sup>th</sup> of each year, Dad shall be responsible to pay Mom thirty-five (35%) of the after-tax amount of any bonus he received for the period in which he failed to provide the W-2.

See Decree of Divorce, page 5, lines 15-21. The court also reserved jurisdiction for the purposes of addressing the bonuses. See Decree, page 7, lines 26-28.

Despite Bonnie's requests, Bart failed to provide her with his W2 forms or any portion of the after-tax amount for September 1, 2015 through September 1, 2019. Because he failed to comply with the April 15<sup>th</sup> deadline each year, Bart must pay Bonnie with 35% of the after-tax bonuses plus the legal interest that has accrued as a result of his non-payment.

Upon a thorough and time-consuming review of Bart's employment records, Bart received the following Bonuses:

- Southern Wine and Spirits on 5/15/2015: \$28,764.00

-	
1	o DEF1511
2	- Southern Wine and Spirits on 5/22/2015: \$58,554.08
3	o DEF1047
5	- Bonus Deposited in account on 6/4/2015: \$10,000.00
6	o DEF1053
7	- Shamus & Peabody LLC on 9/1/2015: \$15,000.00
9	o DEF1461
10	- Shamus & Peabody LLCon 2/15/2016: \$2,105.98
11	o DEF1465
13	- Thomas Keller Restaurant Group on 7/22/2016: \$4,646.45
14	o DEF1468
16	- *Golden 2018 - Bonus eligibility 30% base pay
17	o DEF1842
18 19	- Golden Entertainment - signing bonus 2018 on 6/8/2018: \$25,000.00
20	o DEF1863
21	- Resorts World on 6/6/2019: \$25,000.00
23	o DEF1724
24	- Resorts World on 1/9/2020: \$80,384.49 (for the year 2019)
25	o DEF1756
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The total bonuses that Bart received is approximately \$249,455.00. Because Bart failed to provide evidence of his bonus to Bonnie prior to April 15<sup>th</sup> of each year, Bart should pay Bonnie thirty-five (35%) of the after-tax amount of his bonuses. Thus, Bonnie shall receive at least \$87,309.25 (\$249,455.00 x 35%). This figure, however, does not include the interest on each amount due. Bonnie will submit that spreadsheet with her Schedule of Arrears and as a demonstrative exhibit at trial.

#### III.

## THE COURT SHOULD REDUCE BART'S CHILD SUPPORT AND ALIMONY ARREARAGES TO JUDGMENT

As addressed above, Bart owes child support in the principal sum of \$15,331 through to February 2020. Bonnie will update this figure in her Schedule of Arrears. EDCR 5.508 states in relevant part:

A motion alleging the existence of arrears in payment of periodic child support, spousal support, or other periodic payment shall be accompanied by a separately filed schedule showing the date and amount of each payment due, and the date and amount of any payments received.

Bonnie's Schedule of Arrearages sets forth the interest and penalties that have accrued on Bart's child support obligation.

The court may enter an order reducing any support arrearages to judgment. NRS 125.180 states as follows -

1. When either party to an action for divorce, makes default in paying any sum of money as required by the judgment or order directing the payment thereof, the district court may make an order directing entry of judgment for

the amount of such arrears, together with costs and a reasonable attorney's fee.

- 2. The application for such order shall be upon such notice to the defaulting party as the court may direct.
- 3. The judgment may be enforced by execution or in any other manner provided by law for the collection of money judgments.
- 4. The relief herein provided for is in addition to any other remedy provided by law.

## [Emphasis added.]

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The court may also award interest on the child support arrearages owed. NRS 125B.140 states in relevant part -

- 1. Except as otherwise provided in chapter 130 of NRS and NRS 125B.012:
  - (a) If an order issued by a court provides for payment for the support of a child, that order is a judgment by operation of law on or after the date a payment is due. Such a judgment may not be retroactively modified or adjusted and may be enforced in the same manner as other judgments of this state.
- Except as otherwise provided in subsection 3 and NRS 125B.012, 125B.142 and 125B.144:
  - (c) The court shall determine and include in its order:
    - (1) Interest upon the arrearages at a rate established pursuant to NRS 99.040, from the time each amount became due; and
  - (2) A reasonable attorney's fee for the proceeding, unless the court finds that the responsible parent would experience an undue hardship if required to pay such amounts. Interest continues to accrue on the amount ordered until it is paid, and additional attorney's fees must be allowed if required for collection.

[Emphasis added.] Further, the Court must accrue a penalty of 10% per annum on all arrearages past thirty (30) days delinquent pursuant to NRS 125B.095 until February 1, 2020 when NAC 425 became effective. See Schedule of Arrears.

Furthermore, Bonnie requests that the Court reduce Bart's unpaid support sum to judgment. Bonnie also requests that under NRS 125.140 and NRS 125.180, the Court order Bart to pay Bonnie's reasonable attorney's fees incurred in the prosecution of her Motion to reduce child support arrearages to judgment

#### IV.

## THE COURT SHOULD REDUCE BART'S UNPAID ATTORNEY FEES AND BONUSES TO JUDGMENT

As set forth above, Bart has failed to pay Bonnie attorney fees due under the Court's Decree. See Schedule of Arrearages. Bart owes Bonnie \$5,105 of unpaid attorney fees. The Court should direct that all amounts due should accrue legal interest from the date of the filing of this motion. NRS 17.115 reads:

When no rate of interest is provided by contract or otherwise by law, or specified in the judgment, the judgment draws interest from the time of service of the summons and complaint until satisfied, except for any amount representing future damages, which draws interest only from the time of the entry of the judgment until satisfied, at a rate equal to the prime rate at the largest bank in Nevada as ascertained by the commissioner of financial institutions on January 1 or July 1, as the case may be, immediately preceding the date of judgment, plus 2 percent. The rate must be adjusted accordingly on each January 1 and July 1 thereafter until the judgment is satisfied.

Moreover, when parties to pending litigation enter into a settlement, they enter into a contract. Such a contract is subject to general principles of contract law. Grisham v.

- 1. When there is no express contract in writing fixing a different rate of interest, interest must be allowed at a rate equal to the prime rate at the largest bank in Nevada, as ascertained by the Commissioner of Financial Institutions, on January 1 or July 1, as the case may be, immediately preceding the date of the transaction, plus 2 percent, upon all money from the time it becomes due, in the following cases:
  - (a) Upon contracts, express or implied, other than book accounts.
  - (b) Upon the settlement of book or store accounts from the day on which the balance is ascertained.
  - (c) Upon money received to the use and benefit of another and detained without his or her consent.
  - (d) Upon wages or salary, if it is unpaid when due, after demand therefor has been made.

The rate must be adjusted accordingly on each January 1 and July 1 thereafter until the judgment is satisfied.

Here, Bart and Bonnie entered into a settlement. The Decree is subject to general principles of contract law. The parties did not expressly fix an interest rate. The legal interest rate applies to Bart's nonpayment. The interest due is \$1,523.78. The total amount, including interest, is \$6,628.78. Bonnie requests that the enter its judgment in favor of Bonnie and against Bart in that amount, and that it includes in that judgment the payment of legal interest from the date of the filing of this Motion.

The court should also include the legal interest rate in calculating Bart's non-payment of Bonnie's portion of the bonuses. Bart owes Bonnie \$87,309.25. This figure, however, is subject to different time periods and interest rates. Thus, a full accounting will be submitted

with Bonnie's Schedule of Arrears. With the current interest rate of 5.25%, however, Bart's interest on \$87,309.25 is approximately \$381.98 each month.

V.

## THE COURT SHOULD SANCTION BART FOR VIOLATING THE COURT'S ORDERS

EDCR 7.60(b) states in pertinent part:

- (b) The court may, after notice and an opportunity to be heard, impose upon an attorney or a party any and all sanctions which may, under the facts of the case, be reasonable, including the imposition of fines, costs or attorney's fees when an attorney or a party without just cause:
- (3) So multiplies the proceedings in a case as to increase costs unreasonably and vexatiously.
- (5) Fails or refuses to comply with any order of a judge of the court.

Here, Bart's failures to pay are willful. Bart is a successful businessman. Upon information and belief Bart continues to receive a significant salary including yearly bonuses. There is no legitimate excuse for Bart's nonpayment. He continues to live the same lifestyle he lived during the parties' marriage. He continues to reside in a nice home, purchase discretionary items, take vacations, etc. The Court should enter its order sanctioning Bart for his nonpayment of child support, alimony, and attorney's fees due under the parties' stipulated decree.

As a result of Bart's noncompliance, he has unnecessarily multiplied the proceedings in this matter by failing to comply with the Court's orders. Bonnie has attempted to minimize the fees related to this matter by giving Bart more than ample opportunity to

comply with these orders and by postponing the filing of this Motion. Bart also failed to provide any evidence to support his claims in his opposition. In fact, Bart failed to file his FDF for months. As a result, Bonnie was forced to directly subpoena documents to ensure timely compliance. The Court should sanction Bart due to his continued, and repeated violations of the Court's orders.

Bart should be sanctioned in order to ensure his compliance in the future. Unless he is sanctioned with a monetary fine, Bart will continue to consider himself above the law and will not abide by the court's orders.

Further, Bonnie seeks a judgment against Bart for the fees she has had to expend in filing her Motion, preparing for this evidentiary hearing, and in attempting to seek Bart's compliance with the Court's orders. A memorandum of fees and costs incurred by Bonnie in filing of this Motion shall be produced to the Court upon the Court's direction. Bonnie seeks judgment against Bart for the full amount of fees and costs she has incurred.

#### VII.

## BONNIE'S REQUEST FOR REVIEW AND MODIFICATION OF CHILD SUPPORT SHOULD BE GRANTED

NRS 125B.145(1) reads:

- 1. An order for the support of a child must, upon the filing of a request for review by:
  - (a) The Division of Welfare and Supportive Services of the Department of Health and Human Services, its designated representative or the district attorney, if the Division of Welfare and Supportive Services or the district attorney has jurisdiction in the case; or

(b) A parent or legal guardian of the child, be reviewed by the court at least every 3 years pursuant to this section to determine whether the order should be modified or adjusted. Each review conducted pursuant to this section must be in response to a separate request.

Here, the last order regarding child support was filed on February 3, 2016, more than three years ago. For those reasons, Bonnie requests that this Court review and modify the child support award.

Bart's FDF filed December 13, 2019 indicates that he earns \$132.21 per hour, which is \$274,996.80 per year or a gross monthly income of \$22,916.40. Pursuant to NAC 425, his child support should be calculated as follows for one child:

- 
$$$6,000 \times 16\% = $960$$

$$- + $4,000 \times 8\% = $320$$

$$+$$
 \$12,916.40 = \$517

$$= $1,797$$

Pursuant to NAC 425, \$1,797 for one child should be retroactive from when Bonnie filed her motion in May 2019 or in the alternative, to when the parties' oldest daughter emancipated to present until their second child emancipates.

On October 1, 2019, Brigitte emancipated. Bart unilaterally decided to reduce his child support obligation from \$2,182 to \$1,091 per month without a court order allowing him to do so. Brigitte, however, did not graduate until the following spring. Thus, her child support should have continued until graduation. Thus, the current court ordered child support remains \$2,182. Nevertheless, as a result of the Brigitte's graduation and the

enactment of NAC 425 on February 1, 2020, Bonnie reserves the right to file a Trial Brief pursuant to EDCR 7.27 on this matter.

#### VIII.

# THE COURT SHOULD ENTER AN ORDER DIRECTING BART TO PAY BONNIE'S REASONABLE ATTORNEY'S FEES AND COSTS INCURRED IN THE PROSECUTION OF THIS MOTION

As discussed above, Bart has multiplied these proceedings and as a result, Bonnie has incurred attorney's fees and costs in the prosecution of this Motion. A request for an order directing another party to pay attorney's fees must be based upon statute, rule or contractual provision. See, e.g, Rowland v. Lepire, 99 Nev. 308, 662 P.2d 1332 (1983). Here, there is a statutory mandate for an award of fees against a party shown to be in arrearages in child support (NRS 125B.140).

Moreover, the Eighth Judicial District Rules are also a basis for an award of fees and a fine (a penalty above the amount of reasonable attorneys and costs) based upon Bart's breach of the Court's Decree.

As stated above, EDCR 7.60 allows an order for attorney's fees when a party multiplies the proceedings or "Fails or refuses to comply with any order of a judge of the court." EDCR 7.60(b)(5).

Here, Bart has refused to comply with the court's Decree requirement that he pay child support, alimony, attorney fees, and health insurance to Bonnie. Bonnie attempted to resolve these issues with Bart, but he refused.

NRS 125.150 pertaining to an award for attorney's fees, states in relevant part,

3. Except as otherwise provided in <u>NRS 125.141</u>, whether or not application for suit money has been made under the provisions of <u>NRS 125.040</u>, the court may award a *reasonable attorney's fee* to either party to an action for divorce if those fees are in issue under the pleadings. [Emphasis added]

In Miller v. Wilfong, 121 Nev. 619, 621, 119 P.3d 727, 730 (2005), the Court stated:

[I]t is within the trial court's discretion to determine the reasonable amount of attorney fees under a statute or rule, in exercising that discretion, the court must evaluate the factors set forth in *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969). Under *Brunzell*, when courts determine the appropriate fee to award in civil cases, they must consider various factors, including the qualities of the advocate, the character and difficulty of the work performed, the work actually performed by the attorney, and the result obtained. We take this opportunity to clarify our jurisprudence in family law cases to require trial courts to evaluate the *Brunzell* factors when deciding attorney fee awards. Additionally, in *Wright v. Osburn*, this court stated that family law trial courts must also consider the disparity in income of the parties when awarding fees. Therefore, parties seeking attorney fees in family law cases must support their fee request with affidavits or other evidence that meets the factors in *Brunzell* and *Wright*.

One of the four factors this Court must review, under the above cited decisions in

Wilfong and Brunzell, is the result obtained. NRCP 54 states in relevant part,

(B) Timing and Contents of the Motion. Unless a statute provides otherwise, the motion must be filed no later than 20 days after notice of entry of judgment is served; specify the judgment and the statute, rule, or other grounds entitling the movant to the award; state the amount sought or provide a fair estimate of it; and be supported by counsel's affidavit swearing that the fees were actually and necessarily incurred and were reasonable, documentation concerning the amount of fees claimed, and points and authorities addressing appropriate factors to be considered by the court in deciding the motion. The time for filing the motion may not be extended by the court after it has expired.

For these reasons, Bonnie requests that the Court enter its judgment directing Bart to pay all of her reasonable attorney's fees and costs incurred in the prosecution of this Motion. Bonnie requests that Court enter judgment against Bart and in favor of Bonnie for all reasonable attorney's fees and costs she has incurred in the prosecution of her Motion to reduce those delinquencies to judgment.

Bonnie requests that the court defer the issue of fees and costs until the end of trial and allow Bonnie to submit a Memorandum of Fees and Costs pursuant to NRCP 54 with a complete analysis of under the *Brunzell* factors and billing history/invoices.<sup>2</sup>

III.

## LIST OF WITNESSES

Other than the parties and a resident witness, list all witnesses intended to be called by you. Further provide a brief summary of the witnesses' anticipated testimony.

None. Only the parties will testify.

V.

## LIST OF EXHIBITS

List and identify specifically each item of evidence intended to be introduced by you at the time of trial:

Any and all documents produced by either party during the discovery phase of this matter including, but not limited to the following:

- A. Bonnie's Financial Disclosure Form
- B. Bart's Financial Disclosure Form

<sup>&</sup>lt;sup>2</sup> Brunzell v. Golden Gate National Bank, 85 Nev. 345, 455 P.2d 31, 33 (1969).

i	C. Schedule of Arrears
•	D. Subpoena response from Chase Bank
2	E. Subpoena response from Wells Fargo Bank
3	F. Subpoena response from First Republic Bank
	G. Subpoena response from Southern Glazier Wine and Spirits
4	H. Subpoena response from Resorts World Las Vegas
5	I. Subpoena response from Golden Entertainment
6	J. Chase Checking Account ending #1595, statements from December 2014 to
	August 2019
7	K. Zelle Transfers between the parties
8	L. Transfers from Bart to Bonnie, June 2019 through to March 2020
٨	M. Bonnie's Chase x1595 August 2019 through to February 2020
9	N. Letter from A. Grigsby, dated December 13, 2019
10	O. Defendant's Exhibits to Her Initial Motion
11	P. Emails between the parties September 2015 email string regarding transportation
	fees
12	Q. Emails between the parties January 2016 and February 2016 emails regarding
13	orthodontist expenses
14	R. Emails between the parties January 2019 email regarding arrears
14	S. Email re IRS Tax Issues, February 2018
15	T. Email re Brigitte Ortho Fees
16	U. Attached copies of Brigitte billing
.	V. Letter from Merrick Bank re Collections, February 18, 2016
17	W. Email re Brigitte Ortho Fees with Bills attached X. Emails re Overdue Bills
18	Y. Lake Avenue Ortho – Financial Arrangements for Patients
19	Z. Emails between the parties re Divorce Decree, November 20, 2015
*	AA. Emails between the parties re Support is past due, January 14-28, 2019
20	BB. Emails between the parties re Possible Suspension – Sophia Mahoney,
21	March 28, 2019 – April 30, 2019
22	CC. Emails between the parties re US, March 13, 2014
22	DD. Text Messages between the parties, beginning April 2017
23	EE. Radford J. Smith, Chartered Billing Statements
24	Lilli, Tudioid V. Danielli, Charles Santa Santa Santa
	VI

Length of trial: The trial is currently scheduled for half a day.

LENGTH OF TRIAL

## Dated this 23<sup>rd</sup> day of November 23, 2020.

## RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman
KIMBERLY A. STUTZMAN, ESQ.
Nevada State Bar No. 014085
2470 St. Rose Parkway, Suite 206
Henderson, Nevada 89074
Attorney for Defendant

AA000328

## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Radford J. Smith Chartered ("the Firm"). I am over the age of 18 and not a party to the within action.

I served the foregoing document described as "DEFENDANT'S PRE-TRIAL MEMORANDUM" on November 23, 2020, to all interested parties as follows:

BY ELECTRONIC MAIL: Pursuant to EDCR 7.26, I transmitted a copy of the foregoing document this date via electronic mail to the electronic mail address shown below;

Bart Mahoney 7960 Rafael Rivera Way, #300 Las Vegas, NV 89113

Bart Mahoney bmmlv27@gmail.com

/s/ Malia Banks

An employee of Radford J. Smith, Chartered

Electronically Filed
11/24/2020 5:19 PM
Steven D. Grierson
CLERK OF THE COURT

**EXHS** 

RADFORD J. SMITH, CHARTERED KIMBERLY A. STUTZMAN, ESQ.

Nevada Bar No. 014085

2470 St. Rose Parkway, Suite 206

Henderson, Nevada 89074

Telephone: (702) 990-6448

Facsimile: (702) 990-6456

kstutzman@radfordsmith.com

Attorneys for Defendant

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

BARTHOLOMEW M. MAHONEY, JR.,

CASE NO.: D-13-477883-D

DEPT NO.: S

Plaintiff,

vs.

BONNIE M. MAHONEY,

Defendant.

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DEFENDANT'S LIST OF TRIAL EXHIBITS

Date of Trial: December 3, 2020 Time of Trial: 9:15 a.m.

COMES NOW Defendant, BONNIE MAHONEY ("Bonnie"), by and through her

attorney, Kimberly A. Stutzman, Esq. of the law firm of RADFORD J. SMITH,

CHARTERED, and hereby submits her List of Exhibits for use at Trial.

1	Exh.	Description	Offer	Object	Admit
1	A,	Bonnie's Financial Disclosure Form			
2	B.	Bart's Financial Disclosure Form			
3	C.	Schedule of Arrears, including demonstrative			
4		exhibits:		1	
<b>"</b>		1. Child Support and Alimony Arrears			
5		2. Attorney's Fees Arrears			
6		3. Bonus Information			
_		4. Southern Wine and Spirits Bonus May 15,			
7		2015			
8		5. Southern Wine and Spirits Bonus May 22,			
9		2015			
	}	6. Additional Bonus June 4, 2015			
10		7. Shamus & Peabody LLC, September 1, 2015			
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12		8. Shamus & Peabody LLC, February 15, 2016		/	
		9. Thomas Keller, July 22, 2016			
13		10. Golden Entertainment, signing bonus, June			
14		8, 2018			
15		11. Resorts World, January 9, 2020			
		12. Resorts World, June 6, 2020			
16	D.	Subpoena response from Chase Bank			
17	E.	Subpoena response from Wells Fargo Bank			
18	F.	Subpoena response from First Republic Bank			
	G.	Subpoena response from Southern Glazier Wine			
19		and Spirits			
20	H.	Subpoena response from Resorts World Las			
21		Vegas			
	I.	Subpoena response from Golden Entertainment			
22	J.	Chase Checking Account ending #1595,			
23		statements from December 2014 to August 2019			
24	K.	Zelle Transfers between the parties			
	L.	Transfers from Bart to Bonnie, June 2019 through			
25		to March 2020			
26	M.	a. Bonnie's Chase x1595 August 2019			
<u>,                                    </u>		through to February 2020			
27	N.	Letter from A. Grigsby, dated December 13, 2019			
28	О.	Defendant's Exhibits to Her Initial Motion			<b></b>

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	X. Y.	Lake Avenue Ortho – Financial Arrangements for			
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	Z.	Emails between the parties re Divorce Decree,			
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	AA.	Emails between the parties re Support is past due,			
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	BB.	Emails between the parties re Possible Suspension  March 28, 2019 – April 30,	 		
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		Emails between the parties re US, March 13, 2014			 
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Dated this 24th day of November 2020.

RADFORD J. SMITH, CHARTERED

23 /s/ Kimberly A. Stutzman

KIMBERLY A. STUTZMAN, ESQ.

25 | Nevada State Bar No. 014085

2470 St. Rose Parkway, Suite 206

Henderson, Nevada 89074

Attorney for Defendant

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#### **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Radford J. Smith Chartered ("the Firm"). I am over the age of 18 and not a party to the within action.

I served the foregoing document described as "DEFENDANT'S LIST OF TRIAL EXHIBITS" on November 24, 2020, to all interested parties as follows:

BY ELECTRONIC MAIL: Pursuant to EDCR 7.26, I transmitted a copy of the foregoing document this date via electronic mail to the electronic mail address shown below;

Bart Mahoney 7960 Rafael Rivera Way, #300 Las Vegas, NV 89113

Bart Mahoney bmmlv27@gmail.com

/s/ Kimberly A. Stutzman
An employee of Radford J. Smith, Chartered

Electronically Filed 11/24/2020 5:25 PM Steven D. Grierson CLERK OF THE COURT

**EXHS** 

RADFORD J. SMITH, CHARTERED

KIMBERLY A. STUTZMAN, ESQ.

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Telephone: (702) 990-6448

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kstutzman@radfordsmith.com

Attorneys for Defendant

DISTRICT COURT FAMILY DIVISION CLARK COUNTY, NEVADA

BARTHOLOMEW M. MAHONEY, JR.,

THOCOME WILL WITH THE TAXABLE PROPERTY.

Plaintiff,

llvs.

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BONNIE M. MAHONEY,

Defendant.

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CASE NO.: D-13-477883-D

DEPT NO.: S

## **DEFENDANT'S AMENDED LIST OF TRIAL EXHIBITS**

Date of Trial: December 3, 2020 Time of Trial: 9:15 a.m.

COMES NOW Defendant, BONNIE MAHONEY ("Bonnie"), by and through her

attorney, Kimberly A. Stutzman, Esq. of the law firm of RADFORD J. SMITH,

CHARTERED, and hereby submits her List of Exhibits for use at Trial.

1 Bkh: Description A. Bonnie's Financial Disclosure Form B. Bart's Financial Disclosure Form C. Schedule of Arrears, including demonstrative exhibits:  1. Child Support and Alimony Arrears 2. Attorney's Fees Arrears 3. Bonus Information 4. Southern Wine and Spirits Bonus May 15, 2015 5. Southern Wine and Spirits Bonus May 22, 2015 6. Additional Bonus June 4, 2015 7. Shamus & Peabody LLC, September 1, 2015 8. Shamus & Peabody LLC, February 15, 2016 9. Thomas Keller, July 22, 2016 10. Golden Entertainment, signing bonus, June 8, 2018 11. Resorts World, January 9, 2020 12. Resorts World, June 6, 2020 D. Bart's W-2s 2015-2018 E. Subpoena response from Chase Bank F. Subpoena response from Wells Fargo Bank G. Subpoena response from First Republic Bank H. Subpoena response from Resorts World Las Vegas J. Subpoena response from Resorts World Las Vegas J. Subpoena response from Golden Entertainment K. Chase Checking Account ending #1595, statements from December 2014 to August 2019 Letter from A. Grigsby, dated December 13, 2019  12. Cetter from A. Grigsby, dated December 13, 2019		Total Section 1		Offer	Object	Admit
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28 O. Letter from A. Grigsby, dated December 13, 2019	27		through to February 2020			
	28	O.	Letter from A. Grigsby, dated December 13, 201	9		

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P.	Defendant's Exhibits to Her Initial Motion		
O.	Emails between the parties September 2015 email		
	string regarding transportation fees	 	
R.	Emails between the parties January 2016 and		
	February 2016 emails regarding orthodontist		
1	expenses		
S.	Emails between the parties January 2019 email		
	regarding arrears	 	
T.	Email re IRS Tax Issues, February 2018	 <u> </u>	<u> </u>
U.	Email re Brigitte Ortho Fees		
V.	Attached copies of Brigitte billing	 	
W.	Letter from Merrick Bank re Collections,		
	February 18, 2016		
X.	Email re Brigitte Ortho Fees with Bills attached		-
Y.	Emails re Overdue Bills		
Z.	Lake Avenue Ortho – Financial Arrangements for		
	Patients		
AA.	Emails between the parties re Divorce Decree,		
	November 20, 2015	 	
BB.	Emails between the parties re Support is past due,		
	January 14-28, 2019		
CC.	Emails between the parties re Possible Suspension		ļ
	- Sophia Mahoney, March 28, 2019 - April 30,		
	2019		
DD.	Emails between the parties re US, March 13, 2014		
EE.	Text Messages between the parties, beginning		
	April 2017	 	
FF.	Radford J. Smith, Chartered Billing Statements		

Dated this 24th day of November 2020.

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RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman
 KIMBERLY A. STUTZMAN, ESQ.
 Nevada State Bar No. 014085
 2470 St. Rose Parkway, Suite 206
 Henderson, Nevada 89074
 Attorney for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Radford J. Smith Chartered ("the Firm"). I am over the age of 18 and not a party to the within action.

I served the foregoing document described as "DEFENDANT'S LIST OF TRIAL EXHIBITS" on November 24, 2020, to all interested parties as follows:

BY ELECTRONIC MAIL: Pursuant to EDCR 7.26, I transmitted a copy of the foregoing document this date via electronic mail to the electronic mail address shown below;

Bart Mahoney 7960 Rafael Rivera Way, #300 Las Vegas, NV 89113

Bart Mahoney bmmlv27@gmail.com

/s/ Kimberly A. Stutzman
An employee of Radford J. Smith, Chartered

**Electronically Filed** 11/25/2020 9:57 AM Steven D. Grierson CLERK OF THE COURT

**EXHS** 

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RADFORD J. SMITH, CHARTERED KIMBERLY A. STUTZMAN, ESQ.

Nevada Bar No. 014085

2470 St. Rose Parkway, Suite 206

Henderson, Nevada 89074

Telephone: (702) 990-6448

Facsimile: (702) 990-6456

kstutzman@radfordsmith.com

Attorneys for Defendant

### DISTRICT COURT FAMILY DIVISION CLARK COUNTY, NEVADA

BARTHOLOMEW M. MAHONEY, JR.,

Plaintiff,

VS.

BONNIE M. MAHONEY,

Defendant.

CASE NO.: D-13-477883-D

DEPT NO.: S

## **DEFENDANT'S SECOND AMENDED LIST OF TRIAL EXHIBITS**

Date of Trial: December 3, 2020 Time of Trial: 9:15 a.m.

COMES NOW Defendant, BONNIE MAHONEY ("Bonnie"), by and through her

attorney, Kimberly A. Stutzman, Esq. of the law firm of RADFORD J. SMITH,

CHARTERED, and hereby submits her List of Exhibits for use at Trial.

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Exh. Description  A. Bonnie's Financial Disclosure Form  B. Bart's Financial Disclosure Form  C. Schedule of Arrears, including demonstrative exhibits:  1. Child Support and Alimony Arrears  2. Attorney's Fees Arrears  3. Bonus Information  4. Southern Wine and Spirits Bonus May 15, 2015  5. Southern Wine and Spirits Bonus May 22, 2015  6. Additional Bonus June 4, 2015  7. Shamus & Peabody LLC, September 1, 2015  8. Shamus & Peabody LLC, February 15, 2016  9. Thomas Keller, July 22, 2016  10. Golden Entertainment, signing bonus, June 8, 2018  11. Resorts World, January 9, 2020  12. Resorts World, June 6, 2020  D. Bart's W-2s 2015-2018  E. Subpoena response from Chase Bank  F. Subpoena response from Wells Fargo Bank  G. Subpoena response from First Republic Bank  H. Subpoena response from Golden Entertainment and Spirits  I. Subpoena response from Golden Entertainment  K. Chase Checking Account ending #1595, statements from December 2014 to August 2019  L. Zelle Transfers between the parties  M. Transfers from Bart to Bonnie, June 2019 through to March 2020  N. a. Bonnie's Chase x1595 August 2019  through to February 2020						
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27 through to February 2020	2	6 N.	a. Bonnie's Chase x1595 August 2019			
111 - 1 12 2010	2		through to February 2020			
O. Letter from A. Grigsby, dated December 13, 2019	2	28    O.	Letter from A. Grigsby, dated December 13, 2019	<u> </u>		

P.	Defendant's Exhibits to Her Initial Motion			
Q.	Emails between the parties September 2015 email			
	string regarding transportation fees			
R.	Emails between the parties January 2016 and			
	February 2016 emails regarding orthodontist			
	expenses			
S.	Emails between the parties January 2019 email			
	regarding arrears			
T	Email re IRS Tax Issues, February 2018			
U.	Email re Brigitte Ortho Fees			
<u>V.</u>	Attached copies of Brigitte billing		 	
W.	Letter from Merrick Bank re Collections,			
	February 18, 2016		 	
<u>X.</u>	Email re Brigitte Ortho Fees with Bills attached		 	
Y.	Emails re Overdue Bills			
Z.	Lake Avenue Ortho – Financial Arrangements for			
	Patients		 	
4A.	Emails between the parties re Divorce Decree,		!	
	November 20, 2015	_		
BB.	Emails between the parties re Support is past due,		ļ	
	January 14-28, 2019			
CC.	Emails between the parties re Possible Suspension			
	- Sophia Mahoney, March 28, 2019 - April 30,			
	2019		 	
DD.	Emails between the parties re US, March 13, 2014			
EE.	Text Messages between the parties, beginning			
	April 2017			
FF.	Radford J. Smith, Chartered Billing Statements	****		
GG.	Subpoena Response from Wynn Las Vegas			
Datad	this 25th day of November 2020			

Dated this 25<sup>th</sup> day of November 2020.

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### RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman
 KIMBERLY A. STUTZMAN, ESQ.
 Nevada State Bar No. 014085
 2470 St. Rose Parkway, Suite 206
 Henderson, Nevada 89074
 Attorney for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Radford J. Smith Chartered ("the Firm"). I am over the age of 18 and not a party to the within action.

I served the foregoing document described as "DEFENDANT'S LIST OF TRIAL EXHIBITS" on November 25, 2020, to all interested parties as follows:

BY ELECTRONIC MAIL: Pursuant to EDCR 7.26, I transmitted a copy of the foregoing document this date via electronic mail to the electronic mail address shown below;

Bart Mahoney 7960 Rafael Rivera Way, #300 Las Vegas, NV 89113

Bart Mahoney bmmlv27@gmail.com

/s/ Courtney Janson
An employee of Radford J. Smith, Chartered

Electronically Filed
11/30/2020 4:14 PM
Steven D. Grierson
CLERK OF THE COURT

- 1		
1	SCHD	
2	RADFORD J. SMITH, CHARTERED	
	KIMBERLY A. STUTZMAN, ESQ.	
3	Nevada State Bar No. 014085	
4	2470 St. Rose Parkway Suite 206	
5	Henderson, Nevada 89014 Telephone: (702) 990-6448	
	Facsimile: (702) 990-6456	
6	kmedina@radfordsmith.com	
7	Attorneys for Defendant	
8	11	T COUDT
9	DISTRIC	T COURT
	CLARK COU	NTY, NEVADA
10		1
11	I AMATIONEY IP	CASE NO.: D-13-477883-D
12	BARTHOLOMEW M. MAHONEY, JR.,	DEPT NO.: S
	District of	
13	Plaintiff,	FAMILY DIVISION
14	VS.	
15	BONNIE M. MAHONEY,	
16		
1′	Defendant.	
	TIDDATED SCHEDI	JLE OF ARREARAGES
1		
1	DATE OF HEARI	NG: November 13, 2019
2		ARING: 9:15 a.m.
2	1	
2	STATE OF NEVADA ) ss.	
	OF OF ARV	
2	KIMBERLY STUTZMAN, ESQ., d	eclares and says:
	1. I am the Attorney for the Def	endant in the above-entitled matter.
	27	
	28	
	1.1	

- 2. Defendant, BONNIE MAHONEY is owed and entitled to receive certain periodic monthly payments from Plaintiff, BARTHOLOMEW M. MAHONEY, JR. ("Bart") pursuant to the stipulated Decree of Divorce ("Decree") filed on February 3, 2016.
- 3. BARTHOLOMEW M. MAHONEY, JR. failed to make complete and full payments when due.
- 4. The Updated Schedule of Arrears for Child Support, Spousal Support, Attorney Fees, and Bonuses is attached hereto as Exhibit "A" is a true and accurate statement of all payment due dates and payments received during the months noted along with the interest and penalties.
- 5. Bart owes in combined support arrears of \$25,741.00. Interest and penalties (through January 31, 2020 pursuant to NAC 425) accrued. Bart owes \$3,703.06 in interest and \$4,042.32 in penalties. Thus, Bart owes unpaid support in the amount of \$33,486.38.
- 6. Bart is also in arrears for attorney fees and costs in the amount of \$5,105.00. Interest also accrued in the amount of \$1,523.78. Bart owes a total for unpaid attorney's fees in the amount of \$6,628.78.

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# 7. Bart received the following bonuses, none of which he provided information before April of each of the following year to Bonnie:

Southern Wine and Spirits	2015	5/15/2015	\$ 28,764.00	DEF1511
Southern Wine and Spirits	2015	5/22/2015	\$ 58,554.08	DEF1047
Bonus Deposited in acct	2015	6/4/2015	\$ 10,000.00	DEF1053
Shamus & Peabody LLC	2015	9/1/2015	\$ 15,000.00	DEF1461
Shamus & Peabody LLC	2016	2/15/2016	\$ 2,105.98	DEF1465
Thomas Keller Restaurant				
Group	2016	7/22/2016	\$ 4,646.45	DEF1468
Wynn Las Vegas	2017	1/8/2017	\$ 40,000.00	DEF2176
Wynn Las Vegas	2018	1/19/2018	\$ 40,000.00	DEF2174
*Golden 2018 - Bonus				
eligibility 30% base pay				DEF1842
Golden Entertainment -				
signing bonus	2018	6/8/2018	\$ 25,000.00	DEF1863
Resorts World	2019	1/9/2020	\$ 80,384.49	DEF1756
Resorts World	2019	6/6/2019	\$ 25,000.00	DEF1724

# 8. Because Bart failed to provide the information, Bonnie is entitled to receive 35% of the bonus as follows:

Southern Wine and Spirits	\$	10,067.40
Southern Wine and Spirits	\$	20,493.93
Bonus Deposited in acct	\$	3,500.00
Shamus & Peabody LLC	\$	5,250.00
Shamus & Peabody LLC	\$	737.09
Thomas Keller Restaurant Group	\$	1,626.26
Wynn Las Vegas	\$	14,000.00
Wynn Las Vegas	\$	14,000.00
*Golden 2018 - Bonus eligibility 30% base		
pay	9	-
Golden Entertainment - signing bonus	\$	8,750.00
Resorts World	\$	28,134.57
Resorts World	\$	8,750.00

Southern Wine and Spirits	\$	13,062.45
Southern Wine and Spirits	\$	26,590.87
Southern Wine and Spirits	\$	4,541.25
Bonus Deposited in acct	\$	6,811.88
Shamus & Peabody LLC	\$	915.39
Shamus & Peabody LLC	\$	2,019.61
Thomas Keller Restaurant Group	\$	16,520.00
Wynn Las Vegas	\$	16,520.00
Wynn Las Vegas	+ +	
*Golden 2018 - Bonus eligibility 30% base		
pay gigning honus	\$	9,712.50
Golden Entertainment - signing bonus	\$	29,347.87
Resorts World	+ <del>*</del>	9,127.34
Resorts World	1_4	

- 10. The total bonus monies owed to Bonnie including interest is \$135,169.16.
- 11. Thus, the combined support arrears, attorney fees, and bonus arrears of \$175,284.32. That amount should be reduced to judgment collectable by any and all legal means.
- 12. Under penalty of perjury, pursuant to the best information known and available to me, the following schedule accurately sets out the dates and amounts of periodic payments due pursuant to a lawful court order, the dates and amounts of all payments received, and the principal, interest, and penalties due.

] [	
1	13. I declare under penalty of perjury, under the laws of the State of Nevada and
2 3	the United States (NRS 53.045 and 28 U.S.C. § 1746), that the foregoing is true and
4	correct.
5	RADFORD J. SMITH, CHARTERED
6	/s/ Kimberly A. Stutzman
7	KIMBERLY A. STUTZMAN, ESQ.
8	Nevada State Bar No. 014085 2470 St. Rose Parkway Suite 206
9	Henderson, Nevada 89014
10 11	Telephone: (702) 990-6448 Facsimile: (702) 990-6456
12	kstutzman@radfordsmith.com
13	Attorneys for Defendant
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<ul><li>24</li><li>25</li></ul>	
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## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Radford J. Smith, Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. Under the Firm's practice, mail is to be deposited with the U.S. Postal Service on the same day as stated below, with postage thereon fully prepaid.

I served the foregoing documents described as **UPDATED SCHEDULE OF** 

ARREARS on this 30th day of November 2020, to all interested parties

BY ELECTRONIC MAIL: Pursuant to Admin Order 20-17:

Bart Mahoney bmmlv27@gmail.com

/s/ Kimberly A. Stutzman
An employee of Radford J. Smith, Chartered

## EXHIBIT "A"

Mahoney adv. Mahoney															
D-13-477883-D															
Dept. S								***************************************							
Child Support & Spousal Support	Toddi	-												-	
											٠.				1.1
Date Due	Am	Amount Due	P4	Payment		Monthly	Annual Legal Interest Rate	Monthly Interest Rate as Factor		Accrued	Monthly	Monthly Interest	Monthly Penalty Rate as Factor (10% per annum	Month	Monthly Penalty
						P	(percent)						31, 2020)		
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September, 2012	9 64	4 850 00	, 60	6.088.00	6-5	(1,238.00)	5.25	0.00438	€9	(1,238.00)	↔	(5.42)	0.008333	ક્ક	(10.32)
November 2015	69	4.850.00	65	4,754.00	S	96.00	5.25	0.00438	60	(1,142.00)	S	(5.00)	0.008333	S	(9.52)
December 2015	67	4,850.00	8	4,956.41	€5	(106.41)	5.25	0.00438	8	(1.248.41)	8	(5.46)	0.008333	<i>y</i> 6	10.401
January 2016	es	4,850.00	S	2,807.59	S	2,042.41	5.50	0.00458	S	794.00	64)	3.64	0.008333	م رم	717
February, 2016 (DOD)	69	4,850.00	65	4,790.00		60.00	5.50	0.00458	S	854.00	S	3.91	0.008553	ی و	43.36
March, 2016	e>	4,850.00	es,	500.00		4,350.00	5.50	0.00458	S	5,204.00	<i>y</i> (	25.85	0.000333	9 6	47.53
April, 2016	ss	4,850.00	<sub>6</sub> ન્ડ	4,350.00	69	500.00	5.50	0.00458	A C	5,704.00	٥	21.07	0.006333	9 6	57.95
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July, 2016	ક	4,850.00	43	4,300.00		550.00	5.50	0.00458	A 6	3,034.00	-4-	56.20	0.008333	6	102.36
August, 2016	69	4,850.00	69	1,220.00		3,630.00	5.50	0.00458	Ą	12,264.00	_	20.30	0.006333	9 64	98 78
September, 2016	85	4,850.00	S	5,280.00	S	(430.00)	5.50	0.00458	Ą	11,854.00	A 6	24.55	0.006333	9 6	98.78
October, 2016	S	4,850.00	↔	4,850.00		1	5.50	0.00458	v) e	11,854.00		24.33	0.008333	9 6	102 11
November, 2016	\$	4,850.00	69	4,450.00	- 1	400.00		0.00458	A 6	10.4524.00	+	78.82	0.00833	9 64	88.78
December, 2016	\$	4,850.00	બ્ર	6,450.00		(1,600.00)		0.00458	A 6	10,624.00	٥	50.67	0.008333	8	88.11
January, 2017	S	4,850.00	€\$	4,930.00		(80.00)	5.75	0.004/9	9 6	9.474.00	+	45.16	0.008333	65	78.53
February, 2017	\$	4,850.00	<del>6</del>	6,000.00	A 6	(1,150.00)		0.00479	S	9,014.00	4	43.19	0.008333	89	75.11
March, 2017	A 6	4,850.00	9 6	5 100 00	_	(00.027)		0.00479	\$	8,764.00	S	41.99	0.008333	S	73.03
April, 2017	9 6	4,850.00	, c	5.420.00		(570.00)		0.00479	ક્ક	8,194.00	\$	39.26	0.008333	cs	68.28
Time 2017	9 0	4 850 00	643	4.960.00	_	(110.00)		0.00479	∽	8,084.00	S	38.74	0.008333	50	6/.36
June, 2017	6/	4 850.00	69	5,000.00	┸	(150.00)	6.25	0.00521	ક્ક	7,934.00	S	41.32	0.008333	<u>م</u>	66.11
Aug, 2017	• 64	4 850 00	69	4.500.00	—	350.00	625	0.00521	s	8,284.00	S	43.15	0.008333	54)	69.03
Sentember 2017	8	4.850.00	65	4,500.00	ь.	350.00	6.25	0.00521	89	8,634.00	-1	4.97	0.008333	<i>x</i> (	74.02
October, 2017	ક	4,850.00	s	4,500.00	\$	350.00		0.00521	S	8,984.00	—-	46.79	0.008333	Ą	21.05
November, 2017	S	4,850.00	↩	4,000.00	$\vdash$	850.00		0.00521	8	9,834.00	_	27.12	0.000333	9 6	70.10
December, 2017	S	4,850.00	S	5,100.00	\$	(250.00)		0.00521	S	9,584.00		49.92	0.008333	9 6	70 45
January, 2018	S	4,850.00	S	4,900.00	\$	(50.00)		0.00542	S	9,534.00		21.2	0.008333	9 6	79.86
February, 2018	S	4,850.00		4,800.00		20.00		0.00542	7	30.424.00	A 6	26.57	0.000333	9 64	86.95
March, 2018	S	4,850.00	જ	4,000.00	es.	850.00	6.50	0.00542	Α.	10,454.01	9	20.00	222222	•	

April, 2018	63	4,850.00	↔		450.00	9.50	0.00542	A	10,884.00	<i>^</i>	28.96	0.008333	A	90.70
May, 2018	63	4,850.00	49	4,000.00	850.00	95'9	0.00542	69	11,734.00	<u> </u>	63.56	0.008333	જ	97.78
June, 2018	sa ea	4,850.00	64)	L	(150.00)	6.50	0.00542	S	11,584.00	<b>!</b> —	62.75	0.008333	es.	96.53
July, 2018	ss	4,850.00	8	5,500.00	(650.00)	7.00	0.00583	c/s	10,934.00	⊢	63.78	0.008333	S	91.11
August, 2018	69	4,850.00	S	L	$ _{\mathfrak{S}}$	7.00	0.00583	S	7,784.00	├	45.41	0.008333	S	64.86
September, 2018	ક્ક	4,850.00	s			7.00	0.00583	(A)	8,634.00	s	50.37	0.008333	છ	71.95
October, 2018	64	4,850.00	63	7,750.00 \$	(2,900.00)	7.00	0.00583	ક	5,734.00		33.45	0.008333	<del>\$</del>	47.78
November, 2018	↔	4,850.00	S		2,850.00	00°L	0.00583	બ	8,584.00	\$ (	50.07	0.008333	\$	71.53
December, 2018	8	4,850.00	S		1	7.00	0.00583	↔	8,584.00		50.07	0.008333	\$	71.53
anuary, 2019	69	4,850.00	6-3	4,000.00	850.00	7.50	0.00625	S	9,434.00	<del> </del>	58.96	0.008333	\$	78.61
February, 2019	€5	4,850.00	<b>6</b> 9		850.00	7.50	0.00625	↔	10,284.00	s	64.28	0.008333	\$	85.70
March, 2019	es	4,850.00	↔	3,500.00	1,350.00	7.50	0.00625	S	11,634.00	⊢	72.71	0.008333	\$	96.95
April, 2019	\$	4,850.00	s		1,250.00	7.50	0.00625	\$	12,884.00	s	80.53	0.008333	\$	107.36
May, 2019	8	4,850.00	89		850.00	7.50	0.00625	s	13,734.00		85.84	0.008333	\$	114.45
fune, 2019	s	4,850.00	89	4,400.00	450.00	7.50	0.00625	S	14,184.00	& C	88.65	0.008333	8	118.20
fuly, 2019	S	4,850.00	69		(130.00)	7.50	0.00625	65	14,054.00	s c	87.84	0.008333	\$	117.11
August, 2019	જ	4,850.00	€>	4,000.00	850.00	7.50	0.00625	65	14,904.00	H	93.15	0.008333	\$	124.20
September, 2019 (Al end)	s	2,182.00	8	3,100.00	(918.00)	7.50	0.00625	65	13,986.00	\$	87.41	0.008333	\$	116.55
October, 2019	S	2,182.00	69	2,100.00	82.00	7.50	0.00625	\$	14,068.00	\$ 0	87.93	0.008333	s	117.23
November, 2019	↔	2,182.00	€S		(918.00)	7.50	0.00625	\$	13,150.00	\$ 0	82.19	0.008333	s	109.58
December, 2019	\$	2,182.00	S		(1.00)	7.50	0.00625	\$	13,149.00	Н	82.18	0.008333	S	109.57
January, 2020	↔	2,182.00	\$		•	6.75	0.00563	S	13,149.00	-	73.96	0.008333	s	109.57
February, 2020 (partial)	69	2,182.00	S	I	1,091.00	6.75	0.00563	\$	14,240.00	\$ 0	80.10	0.000000	<del>59</del>	F
March, 2020 (TBD)	S	2,182.00	S	1,091.00	1,091.00	6.75	0.00563	s	15,331.00	\$ 0	86.24	0.000000	S	,
April, 2020 (TBD_	S	2,182.00	S	L	1,091.00	6.75	0.00563	S	16,422.00	\$ 0	92.37	0.000000	<del>59</del>	F
May-20	s	2,182.00	\$	1,682.00 \$	500.00	6.75	0.00563	S	16,922.00	\$ 0	95.19	0.000000	€9	ŀ
Jun-20	es.	2,182.00	_		1,091.00	6.75	0.00563	S	18,013.00	\$ 0	101.32	0.000000	<del>69</del>	•
Jul-20	69	2,182.00	\$	\$ 00.005		5.25	0.00438	S	19,695.00	\$ 0	86.17	0.000000	60	•
Aug-20	S	2,182.00	ક્ત	Н		5.25	0.00438	ક્ક	20,786.00	\$ 0	90.94	0.000000	S	•
Sep-20	ω	2,182.00	↔			5.25	0.00438	S	21,877.00	s 0	95.71	0.000000	Ø,	•
Oct-20	69	2,182.00	65	1,091.00		5.25	0.00438	S	22,968.00	\$ 0	100.49	0.000000	S	•
Nov-20	69	2,182.00	s	1,091.00	1,091.00	5.25	0.00438	٠	24,059.00	$\vdash$	105.26	0.000000	(/7	•
Dec-20	€>	2,182.00	<b>├</b>	\$ 00.005	1,682.00	5.25	0.00438	S	25,741.00	s o	112.62	0.000000	S	-
TOTALS	69	267,712.00	65	241,971.00 \$	25,741.00			S	25,741.00	\$ (	3,703.06		s	4,042.32
		124 140 14	155			Total Accompa	Total A coming & presence through December 2020.	کے پر	ember 202	<b>4</b>				25 741 00
DOLLUS.	2	01-201-501	3314			יייי ביייי	STORE OF THE STORE		707 707					2000
Attorney Fees	A	6,628.78				Total Accru	I otal Accrued Interest through December 2020:	2 5	ember 202	<u>ه</u> و				3,/03.00
Support	ž.	35,486.38	200			I oral Accrueo	renauce imoug	֓֞֝֟֓֟֓֟֓֟֓֟֓֟֓֓֓֟֟֓֓֟֟֓֓֟֟֓֓֓֟֓֓֟֓֓֟֓֟֓֟֓֓֟֓֓֟֓֓֟֓֓֟֓֓֓֟֓֓֟֓֓֡֓֡֡֓֡	cinoei 202					4,046.32
TOTAL	<b>5</b>	15.284.32	190					<u> </u>	TOTAL SUM DUE:	•		The state of the s		× 4×6

ey Fees ate Due											
		<del> </del>									
	10.000	- Po		mth u	ntil paid i	\$555 ner month until paid in full. Approx.	. 19 payments.				
	\$10,000 0wed					Annual Legal					
	Amount Due	a)	Payment	M #	Monthly Arrearage	Interest Rate	Monthly interest Rate as Factor	Accrued Arrearage	rearage	Monthly Interest	Interest
		+		e	255.00	5.25	0.00438	S	555.00	\$	2.43
1 September, 2015		_		9 6	222.00	525	0.00438		1,110.00	€>	4.86
1		-		9 6	20.000	5.25	0.00438	\$	1,110.00	<del>S</del>	4.86
3 November, 2015 \$			555.00	A 6	•	57.5	0.00438		1,110.00	<del>S</del>	4.86
4 December, 2015   \$	\$ 555.00		555.00	٥	1	2.50	0.00458		1 110.00	S	5.09
	\$ 555.00	_	555.00	· 0	3 1 1 1	2.50	0.00438	1	665.00	1_	7.63
9	\$ 555.00			<i>x</i>	555.00	5.50	0.00458		1,190.00		5.45
		-	1,030.00	· ex	(4/5.00)	5.50	0.00458		1.195.00		5.48
8 April, 2016	\$ 555.00	00	550.00	<u>~</u>	3.00	0.50	0.00-00		1 750 00		8.02
May, 2016	\$ 555.00	\$ 00	ı	S	555.00	5.50	0.00450	2	2 305 00	<b>€</b>	10.56
	\$ 555.00	\$ 00		တ	555.00	5.50	0.00450		2 860 00	64	13.11
	\$ 555.00	\$ 00	1	S	555.00	05.5	0.00450		2 415 00		15.65
Angust 2016	\$ 555.00	\$ 00	1	8	555.00	5.50	0.00458	9 6	2 070 00		18.20
910	\$ 555.00	\$ 00	1	€S	555.00	5.50	0.00458		1 525 00	9 64	20.74
t		\$ 00	ı	↔	555.00	5.50	0.00458	4 4	00.000	1	23.78
16		+-		8	555.00	5.50	0.00458		5,080.00		25.62
16 December 2016		+		69	555.00	5.50	0.00458		5,635.00	A 6	20.65
10 Cocamon, 2010	\$ 555.00	\$ 00		8	555.00	5.75	0.00479		7,190.00	Ī.,	20.77
1 / January, 2017		╫		8	565.00	5.75	0.00479		6,/55.00		5.70
18 February, 2017		- 886 686	1	65	6.755.00	5.75	0.00479		6,755.00		52.37
19 March, 2017	0,700	4000		1	6 755 00	5.75	0.00479	9 \$	6,755.00		32.37
20 April, 2017	1	L			6 755 00	5.75	0.00479		6,755.00		32.37
21 May, 2017		╗┼		3 6	6 755 00		0.00479		6,755.00	\$	32.37
22. June, 2017				- 1	6.755.00	$\perp$	0.00521	\$	6,755.00		35.18
23 July, 2017	- [	-+			0,755.00	1	0.00521	\$	5,655.00	\$	29.45
24 August, 2017	\$ 6,755.00	00.	1,100.00	2	0,722.00	_					

25 September, 2017	ક્ક	5,655.00	٠	\$ 5,655.00	6.25	0.00521	89	5,655.00	\$	29.45
26 October, 2017	S	5,655.00	- \$	\$ 5,655.00	6.25	0.00521	\$	5,655.00	\$ 2	29.45
27 November, 2017	ક્ક	5,655.00	\$ 550.00	\$ 5,655.00	6.25	0.00521	\$	5,105.00	\$ 2	26.59
28 December, 2017	69	5,105.00	- \$	\$ 5,105.00	6.25	0.00521	89	5,105.00	\$	26.59
29 January, 2018	\$	5,105.00	- S	\$ 5,105.00	6.50	0.00542	8	5,105.00	\$	27.65
30 February, 2018	\$	5,105.00	- \$	\$ 5,105.00	6.50	0.00542	æ	5,105.00	\$ 2	27.65
31 March, 2018	€>	5,105.00	· <del>\$</del>	\$ 5,105.00		0.00542	s	5,105.00	į	27.65
32 April, 2018	\$	5,105.00	- \$	\$ 5,105.00		0.00542	\$	5,105.00	\$ 2	27.65
33 May, 2018	ક્ક	5,105.00	- \$	\$ 5,105.00	6.50	0.00542	8	5,105.00		27.65
34 June, 2018	\$	5,105.00	- \$	\$ 5,105.00		0.00542	\$	5,105.00	\$ 2	27.65
35 July, 2018	S	5,105.00	- \$	\$ 5,105.00	7.00	0.00583	8	5,105.00	\$ 2	29.78
36 August, 2018	\$	5,105.00	- \$	\$ 5,105.00	7.00	0.00583	€>	5,105.00	\$ 2	29.78
37 September, 2018	\$	5,105.00	- \$	\$ 5,105.00	7.00	0.00583	€>	5,105.00	\$ 2	29.78
38 October, 2018	ક્ર	5,105.00	- \$	\$ 5,105.00		0.00583	69	5,105.00	\$ 2	29.78
39 November, 2018	\$	5,105.00	- \$	\$ 5,105.00		0.00583	€4	5,105.00	\$	29.78
40 December, 2018	↔	5,105.00	- \$	\$ 5,105.00		0.00583	€9	5,105.00		29.78
41 January, 2019	\$	5,105.00	- \$	\$ 5,105.00	7.50	0.00625	8	200	\$	31.91
42 February, 2019	S	5,105.00	- \$	\$ 5,105.00	7.50	0.00625	↔	5,105.00	\$ 3	31.91
43 March, 2019	↔	5,105.00	· ·			0.00625	\$	Ш		31.91
44 April, 2019	↔	5,105.00	- \$	\$ 5,105.00	7.50	0.00625	\$	Ь.,	\$ 3	31.91
45 May, 3029	<del>69</del>	5,105.00	- \$			0.00625	\$		\$ 3	31.91
46 June, 2019	S	5,105.00	- \$	\$ 5,105.00		0.00625	\$	5,105.00	\$ 3	31.91
47 July, 2019	\$	5,105.00	-	\$ 5,105.00		0.00625	\$	5,105.00	\$ 3	31.91
48 Augut, 2019	<b>⇔</b>	5,105.00	- \$	\$ 5,105.00	7.50	0.00625	\$	5,105.00	\$ 3	31.91
49 September, 2019	<del>\$</del>	5,105.00	٠	\$ 5,105.00	7.50	0.00625	\$	5,105.00	\$ 3	31.91
50 December, 2019	\$	5,105.00	-	\$ 5,105.00	7.50	0.00625	\$	5,105.00	\$ 3	31.91
51 November, 2019	\$	5,105.00	- \$	\$ 5,105.00	7.50	0.00625	↔	5,105.00	\$ 3	31.91
52 January, 2020	S	5,105.00		\$ 5,105.00	6.75	0.00563	\$	*=*	\$	28.72
53 February, 2020	S	5,105.00	- \$	\$ 5,105.00	6.75	0.00563	\$	5,105.00	\$ 2	28.72
54 March, 2020	\$	5,105.00	*	\$ 5,105.00	6.75	0.00563	\$	5,105.00	\$ 2	28.72
55 April, 2020	s	5,105.00	-	\$ 5,105.00	6.75	0.00563	\$	5,105.00	\$ 2	28.72
56 May, 2020	↔	5,105.00	1 ↔	\$ 5,105.00	6.75	0.00563	\$	5,105.00	\$ 2	28.72
57 June, 2020	<del>⇔</del>	5,105.00	-	\$ 5,105.00	6.75	0.00563	\$	5,105.00	\$ 2	28.72
55 July, 2020	\$	5,105.00	-	\$ 5,105.00	5.25	0.00438	\$	5,105.00	\$ 2	22.33

6,628.78	<del>69</del>	TOTAL SUM DUE: \$	)TAI	T			: :			_
1,525.70	7	emper 7070.	zh De	Total Accrued Interest through December 2020:	Total Accrue					L
1 573 70	€		١,							
5,105.00	ક	sember 2020:	zh Dec	Total Accrued Arrearage through December 2020:	Potal Accrued					
										_
						00.001,0	4,695.00	A	TOTALS \$ 10,000.00	•
1,523.78	S	5.105.00	S			00 201 2 0	1 005 00	6	2,502,5	1
		0,100.00	<b>₽</b>	0.00458	5.25	\$ 5.105.00	,	4	5 105 00	ø
		5 105 00	6			0,100.00	ı	<del>^</del>	2,105.00	<u>^</u>
22.33	↔	5,105.00	\$	0.00438	5.25	\$ 510500		6	23,102,00	€
22.33	<u>A</u>	2,105.00	<b>~</b>	0.00438	5.25	\$ 5.105.00		4	5 105 00	6
0000	÷   4	20.001.0	9	0.00430	2.73	\$ 5,105.00	ı	↔	5.105.00	6/3
22.33	  •	\$ 105.00	6	0.0000	20.2	22.02.0		9	\$ 3,105.00 \$	2
22.33	↔	5,105.00	4	0.00438	5.25	\$ 5 105 00		6	5 105 00	6

Dits47783-D   Dits4   Airmont   Bates   SSS <sub>0</sub>   Print Dise in Interest Rain at 2015   S120016   S 254,008   DEF1011   S 10,067-40   N/A	Mahoney adv. Mahoney	ahoney											
Veat   Date   Amount   Bairs   S5%   Equation   Monthly   Total   Infecest Pairs   Infece	D-13-477883-D												
Year   Date   Amount   Bates   35%   Promite   Interest Rate as   Arcarage   Interest	Dept. S												
Nomity   N	Bonus												
2015   \$515,2015   \$5 28,754,00   DEF1511   \$10,067,40   N/A   S 20,053   N/A   S 20,0015   \$215,0010   S 20,000   N/A   S 20,000   DEF1047   \$20,093   N/A   S 20,000   DEF1047   \$20,093   N/A   S 20,000   DEF1045   \$2,500.00   N/A   S 20,000   DEF1046   \$2,500.00   N/A   S 20,000   DEF1046   \$2,105,200   N/A   S 20,000   DEF1046   \$2,105,200   N/A   S 20,000   DEF1046   \$2,105,20   N/A   S 20,000   DEF1046   \$2,105,20   N/A   S 20,000   DEF1046   \$2,105,20   N/A   S 20,000   DEF1046   \$2,100,00   DEF1046   \$2,100,00   N/A   S 20,000   DEF1046   \$2,100,00   N/A   S 20,000   DEF1046   \$2,100,00    Сопрану	Yer	Date	Ато	ı	Bates	%58			Monthly Interest Rate as Factor	Accraed Arrearage	Monthly Interest	Total Presently Owed	
10   2015   5722015   5 8555408   DEF1047   5 20,495.99   N/A	1 Southern Wine ar	2015	5/15/2015	s	764.00	DEF1511		57.40	N/A				\$ 13,062.45
Column   C	2 Southern Wine ar	2015	5/22/2015	69	554.08	DEF1047		33.93	N/A				7
DEF 1461   S 5250.00	3 Bonus Deposited	2015	6/4/2015	↔	00.000	DEF1053		00.00	N/A				
No.   2016   21/5/2016   \$ 2,105.98   DEF1465   \$ 737.09   N/A     N	4 Shamus & Peabo	2015	9/1/2015	643	000000	DEF1461		50.00	N/A				9
No.	5 Shamus & Peabo	2016	2/15/2016	69	105.98	DEF1465		37.09	N/A				Ì
1	6 Thomas Keller Re	2016	7/22/2016	<b>↔</b>	646.45	DEF1468		26.26	N/A				
Page   2018   1/19/2018   \$ 40,000.00   DEF2174   \$ 14,000.00   NIA   See Sep. Syreadsheet for each Bonus   \$ 5     December eligibility 30% base pay   DEF1882   \$ 2   1,000.00   NIA   PEF1882   \$ 2   1,000.00   PEF1724   \$ 2   1,000.00   NIA   PEF1882   \$ 2   1,000.00   PEF1724   \$	7 Wynn Las Vegas	2017	1/8/2017	S	000.000	DEF2176		00.00	N/A				
DEF1342   S   S   S   S   S   S   S   S   S	8 Wynn Las Vegas	2018	1/19/2018	65	000000	DEF2174		00.00	N/A	See Sep. 3	Spreadsheet for ea	ach Bonus	\$ 16,520.00
10   10   10   10   10   10   10   10	*Golden 2018 - B	onus eligibility 30%	% base pay			DEF1842	\$	-	N/A				
2019   1/9/2020 S 80,384.49   DEF1756 S 28,134.57   N/A   S 25,000.00   DEF1724 S 8,750.00   DEF	9 Golden Entertain			89	00.000	DEF1863		50.00	N/A				
2019   6/6/2019   \$ 25,000.00   DEF/1724   \$ 8,750.00   NAA   S   S   S   S   S   S   S   S   S	0 Resorts World			S	384.49	DEF1756		34.57	N/A				7
\$ 329,455.00 \$ 115,309.25 \$ 115,309.25	1 Resorts World	2019	6/6/2019	69	000.000	DEF1724		20.00	N/A				\$ 9,127.34
\$ 329,455.00 \$ 115,309.25 \$ 115,309.25 \$ 10,00000000000000000000000000000000000													
\$ 115,309.25				\$ 329	455.00		1	52.60					\$ 135,169.16
60		A VIII A VII								- Marian - M			
		In general,	35% Bonus to W:	8	,309.25								
			- William										
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Mahoney adv. Mahoney	ahoney								
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	Southern Wine and			1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		DEE1511	3 10 067 40	Due Anril 2016	1 2016
Attorney Fees	Spirits	2015		C107/C1/C	7,704.00	DEFISIT		2	
			Mo	Monthly	Annual Legal	Monthly Interest Rate as	Accrued	Monthly	thly
Date Due	Amount Due	Payment	Arre	Arrearage	(percent)	Factor E	Arrearage	Inter	est
١٥٥١٤ اثب ١	10.067.40	s-	8	10.067.40	5.50	0.00458	\$ 10,067.40	_	46.14
Apin, 2010		╂		10,067.40	5.50	0.00458			46.14
May, 2010		+-		10,067.40	5.50	0.00458			46.14
June, 2010		+-	8	10,067.40	5.50	0.00458	İ		46.14
July, 2010		+-	8	10,067.40	5.50	0.00458	\$ 10,067.40	-	46.14
Sentember 2016		1	S	10,067.40	5.50	0.00458		_	46.14
September, 2010		+	69	10,067.40	5.50	0.00458		_	46.14
VCIUDEL, 2010		+	50	10,067.40	5.50	0.00458		$\dashv$	46.14
November, 2010		+-	69	10,067.40	5.50	0.00458			46.14
December, 2010		┰	69	10,067.40	5.75	0.00479			48.24
Tallian 9, 2017		+-	S-	10,067.40	5.75	0.00479			48.24
regulary, 2017		╁	65	10,067.40	5.75	0.00479			48.24
Maich, 2017		╀	6/3	10.067.40	5.75	0.00479			48.24
April, 2017		- S	89	10,067.40	5.75	0.00479		_	48.24
Time 2017			S	10,067.40	5.75	0.00479	\$ 10,067.40	_	48.24
June, 2017	10.067.40	╁	S	10,067.40	6.25	0.00521		_	52.43
July, 2017		+	\$	10,067.40	6.25	0.00521			52.43
Sentember 2017		<b>↓</b>	59	10,067.40	6.25	0.00521	\$ 10,067.40	\$ 0	52.43
October 2017		4—	8	10,067.40	6.25	0.00521		-	52.43
November 2017		╫	643	10,067.40	6.25	0.00521		_	52.43
December 2017		╀	S	10,067.40	6.25	0.00521		_	52.43
Lecelloci, 2017		╁╴	69	10,067.40	6.50	0.00542			54.53
February, 2018		+	8	10,067.40	6.50	0.00542			54.53
Moreh 2018		╁	s	10,067.40	6.50	0.00542		-	54.53
Amil 2018		9	8	10,067.40	6.50	0.00542		-	54.53
May 2018	\$ 10.067.40	€5	89	10,067.40	6.50	0.00542		_	54.53
True 2018		╁┈	8	10,067.40	6.50	0.00542	\$ 10,067.40	\$ 0	54.53
June, 2010		┨							

2	58.73	58.73	58.73	58.73	58.73	62.92	62.92	62.92	62.92	62.92	62.92	62.92	62.92	62.92	62.92	62.92	56.63	56.63	56.63	56.63	56.63	56.63	44.04	44.04	4.04	44.04	44.04	44.04	2,995.05		10,067.40	2,995.05	13,062.45	
•		89			S		<b>↓</b>	↓_	-	-	8	┞—	↓	├_	\$ 0	↓	┤	\$ 0	ـــــ	\$ 01	Ļ	٠.	<del></del>	├	├-	40 \$	.40 \$	40 \$			020: s	020: \$	UE: S	
10 067 40 1	10,067.40	10,067.40	10,067.40	10.067.40	10.067.40	10,067.40	10 067.40	10,067.40	10,067.40	10 067.40	10,067.40	10.067.40	10,067.40	10,067.40	10.067.40	10 067.40	10,067.40	10 067.40	10 067.40	10,067.40	10.067.40	10.067.40	10,067.40	10,067.40	10,067.40		1				ecember 2	ecember 2	TOTAL SUM DUE.	
	9 69	69	64			ş   €	∌ &	9 64	9	3 6	9 64		9 4	9	9	9 6	9 64	9 6	9 6	9 6	3 6	9 6	9 64	9 6	9 6	9 69	165	9 6	9 8	1	T demo	Titom	101	
_	0.00583	-							0.00023	0.00623	0.00625	0.00023	0.00025	0.00625	0.00623	0.00625	0.00662	0.00505	0.00565	0.00563	0.00563	0.00263	0.00563	0.00450	0.00438	0.00450	0.00458	0.00430	0.00458		3 A France through December 2020:	stal Accrued Aucanas, through December 2020:	warann nan	
	7.00	7.00	7.00	7.00	7.00	7.00	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	7.50	6.75	6.75	6.75	6.75	6.75	6.75	5.25	5.25	5.25	5.25	5.25	5.25			Total Accrue	Total Accr	
	10,067.40	10,067.40	10,067.40	10,067.40	10,067.40	10,067.40	10.067.40	10,067.40	10,067.40	10 067.40	10,067.40	10.067.40	10,067.40	10.067.40	10.067.40	10,067.40	10.067.40	10.067.40	10 067.40	10.067.40	10.067.40	10.067.40	10,067.40	10,067.40	10,067.40		10,067.40	10,067.40						
	4	5	5		1		1	9 4		9 8	9 64	1	$\top$	5		9 6	9 &	3 6	1	9 6	9 6	9 6	9 6	1	1	5			9 4	1	1:			
	}		-+	_	_	+	-	10,067.40 \$	- +	-+		-		10,067.40 \$		$\dashv$	10,067.40 \$			10,067.40 \$				+	+	10,067.40	_	_	_		10,067.40			
					8	\$	S	8	89	65	€5	es.	8	89	<del>6/3</del>	€9	69	8	S	8	8	8	8	\$	8	S	\$ 0	S	<b>↓</b>	<b>├</b> -	SS			 $\mid$
		Inly, 2018	Angust 2018 \$	318	-	18	┼	610	6	+-					Amt 2019	September 2019	December 2019	Mariember 2019	Townsett 2020	Eshrijary 2020	March 2020	Amil 2020	April, 2020	Time 2020	Tuly 2020	August, 2020	Sentember, 2020	October 2020	Movember, 2020	December, 2020	TOTALS			

Mahoney adv. Mahoney	ahoney						
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Dept. S							
	Southern Wine						
Attorney Fees	and Spirits	2015	5/22/2015	\$ 58,554.08	DEF1047	\$ 20,493.93	Due April 2016
Date Due	Amount Due	Payment	Monthly Arrearage	Annual Legal Interest Rate	Monthly Interest Rate as	Accrued Arrearage	Monthly Interest
April, 2016	\$ 20,493.93		\$ 20,493.93	5.50	0.00458	\$ 20,493.93	\$ 93.93
May, 2016	\$ 20,493.93	·	\$ 20,493.93	5.50	0.00458	\$ 20,493.93	\$ 93.93
June, 2016	\$ 20,493.93	۱ -		5.50	0.00458	\$ 20,493.93	\$ 93.93
July, 2016	\$ 20,493.93	ı €∕3	\$ 20,493.93	5.50	0.00458	\$ 20,493.93	\$ 93.93
August, 2016	\$ 20,493.93	-	\$ 20,493.93	5.50	0.00458	\$ 20,493.93	\$ 93.93
September, 2016	\$ 20,493.93	-	\$ 20,493.93	5.50	0.00458	\$ 20,493.93	\$ 93.93
October, 2016	\$ 20,493.93	ı € <del>\$</del>	\$ 20,493.93	5.50	0.00458	\$ 20,493.93	\$ 93.93
November, 2016	\$ 20,493.93	-	\$ 20,493.93	5.50	0.00458	\$ 20,493.93	\$ 93.93
December, 2016	\$ 20,493.93	*	\$ 20,493.93	5.50	0.00458		\$ 93.93
January, 2017	\$ 20,493.93	- \$		5.75	0.00479	\$ 20,493.93	\$ 98.20
February, 2017	\$ 20,493.93	- 8	\$ 20,493.93	5.75	0.00479		\$ 98.20
March, 2017	\$ 20,493.93	ı ₩	\$ 20,493.93	5.75	0.00479	\$ 20,493.93	\$ 98.20
April, 2017	\$ 20,493.93	1	\$ 20,493.93	5.75	0.00479	\$ 20,493.93	\$ 98.20
May, 2017	\$ 20,493.93	٠	\$ 20,493.93	5.75	0.00479	\$ 20,493.93	\$ 98.20
June, 2017	\$ 20,493.93		\$ 20,493.93	5.75	0.00479	\$ 20,493.93	\$ 98.20
July, 2017	\$ 20,493.93	*	\$ 20,493.93	6.25	0.00521	\$ 20,493.93	\$ 106.74
August, 2017	\$ 20,493.93	- \$	\$ 20,493.93	6.25	0.00521	\$ 20,493.93	\$ 106.74
September, 2017	\$ 20,493.93	- \$	\$ 20,493.93	6.25	0.00521	\$ 20,493.93	\$ 106.74
October, 2017	\$ 20,493.93	~	\$ 20,493.93	6.25	0.00521	\$ 20,493.93	\$ 106.74
November, 2017	\$ 20,493.93	- \$	\$ 20,493.93	6.25	0.00521	\$ 20,493.93	\$ 106.74
December, 2017	\$ 20,493.93	- \$	\$ 20,493.93	6.25	0.00521	\$ 20,493.93	\$ 106.74
January, 2018	\$ 20,493.93	· <del>69</del>	\$ 20,493.93	6.50	0.00542	\$ 20,493.93	\$ 111.01

February, 2018	€>	20,493.93	S	1	↔	20,493.93	6.50	0.00542	s	20,493.93	€	111.01
March, 2018	\$	20,493.93	\$	ŧ	\$	20,493.93	6.50	0.00542	es.	20,493.93	89	111.01
April, 2018	8	20,493.93	\$	,	\$	20,493.93	6.50	0.00542	<del>59</del>	20,493.93	S	111.01
May, 2018	↔	20,493.93	\$	J	8	20,493.93	6.50	0.00542	↔	20,493.93	\$	111.01
June, 2018	S	20,493.93	\$	t	\$	20,493.93	6.50	0.00542	\$	20,493.93	\$	111.01
July, 2018	↔	20,493.93	\$	•	\$	20,493.93	7.00	0.00583	<del>69</del>	20,493.93	\$	119.55
August, 2018	\$	20,493.93	\$	1	S	20,493.93	7.00	0.00583	ક્ક	20,493.93	\$	119.55
September, 2018	S	20,493.93	\$	-	\$	20,493.93	7.00	0.00583	\$	20,493.93	\$	119.55
October, 2018	89	20,493.93	\$	-	\$	20,493.93	7.00	0.00583	89	20,493.93	\$	119.55
November, 2018	\$	20,493.93	\$	ſ	\$	20,493.93	7.00	0.00583	<del>⊗</del>	20,493.93	\$	119.55
December, 2018	89	20,493.93	\$	•	8	20,493.93	7.00	0.00583	€9	20,493.93	\$	119.55
January, 2019	8	20,493.93	\$	ı	\$	20,493.93	7.50	0.00625	\$	20,493.93	\$	128.09
February, 2019	S	20,493.93	\$	-	\$	20,493.93	7.50	0.00625	S	20,493.93	S	128.09
March, 2019	S	20,493.93	\$	ĵ	↔	20,493.93	7.50	0.00625	↔	20,493.93	\$	128.09
April, 2019	\$	20,493.93	\$	-	\$	20,493.93	7.50	0.00625	\$	20,493.93	\$	128.09
May, 2019	s	20,493.93	\$		\$	20,493.93	7.50	0.00625	es.	20,493.93	\$	128.09
June, 2019	\$	20,493.93	\$		\$	20,493.93	7.50	0.00625	ક	20,493.93	\$	128.09
July, 2019	\$	20,493.93	\$	-	\$	20,493.93	7.50	0.00625	↔	20,493.93	\$	128.09
Augut, 2019	8	20,493.93	\$	1	\$	20,493.93	7.50	0.00625	↔	20,493.93	\$	128.09
September, 2019	æ	20,493.93	\$	,	\$	20,493.93	7.50	0.00625	\$	20,493.93	\$	128.09
December, 2019	\$	20,493.93	&>	-	\$	20,493.93	7.50	0.00625	€9	20,493.93	\$	128.09
November, 2019	\$	20,493.93	89	-	\$	20,493.93	7.50	0.00625	\$	20,493.93	\$	128.09
January, 2020	\$	20,493.93	↔	•	↔	20,493.93	6.75	0.00563	\$	20,493.93	\$	115.28
February, 2020	S	20,493.93	\$	,	↔	20,493.93	6.75	0.00563	↔	20,493.93	\$	115.28
March, 2020	\$	20,493.93	\$	1	S	20,493.93	6.75	0.00563	\$	20,493.93	\$	115.28
April, 2020	S	20,493.93	\$	1	↔	20,493.93	6.75	0.00563	89	20,493.93	\$	115.28
May, 2020	\$	20,493.93	\$	•	S	20,493.93	6.75	0.00563	↔	20,493.93	\$	115.28
June, 2020	જ	20,493.93	↔	ı	<del>\$</del>	20,493.93	6.75	0.00563	\$	20,493.93	\$	115.28
July, 2020	8	20,493.93	8	1	<del>\$</del>	20,493.93	5.25	0.00438	\$	20,493.93	\$	99.68

\$ 20 102 03 8 89 66	\$ 20,473.73 ¢	20,493,93 \$ 89.66	) (	\$ 20,493.93 \$	9 8 89.66	27.607	8   \$ 20,493.93   \$ 89.66	9 00 00, 51	- 8 - 20,493,93 - 8 - 6,020,94	dischibitation in			Total Accined Amearage through December 2020: 3 20,493.93	10 500 F F C C C F F F F F F F F F F F F F F	Total Accrued Interest through December 2020; 3 6,050,57	TO TO STEE STEEL A SCHOOL	OLAL SUM DUE:   3 20,000	
	0.00458	0.00438	t oo o	0.00438	0.000.0	0.00+	0.00438					According to the second	Arrearage	)	ed Interest	Action of the second se		
	5.25	202	(کار (	5.25	101	2.72	505	64.0					heiman Anchied	10 mm 2 mm O 1	Total Accrus			
	20 493 93	20,000	20,495.95	20 493 93		20,493.93		20,493.93		20,470.70			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					
	4	•	·	4	•	1	• •	A .	•	م ا								
	÷	9	↔	6	9	4	<del>-</del>	(A)	SHARING WALLSON, CO., Co., Co., Co., Co., Co., Co., Co., Co	<b>6</b>								
	20 402 02	Ì	20,493.93	İ	20,495.95		-	20.493.93	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	20.493.93	2003.00							
	€	0	\$	- -	^	9	<del>ا د</del>	<u>د</u>	?  ?	U	110		1		+			
		August, 2020	Sentember 2020 \$		October, 2020	7.00	November, 2020 \$	Documber 2020	December, 202	TOTALS								

Mahoney adv. Mahoney	ahoney										
D-13-477883-D											
Dept. S											
	Bonus Deposited	posited									
Attorney Fees	in acct	cct	2015		6/4/2015	\$ 10,000.00	DEF1053	8	3,500.00	Due April 2016	2016
Date Due	Amount Due	ıt Due	Payment		Monthly Arrearage	Annual Legal Interest Rate	Monthly Interest Rate as	An	Accrued Arrearage	Monthly Interest	<b>&gt;</b> 4
Anril 2016	8	3.500.00	· ·	es.	3.500.00	5.50	0.00458	ြမှ	3,500.00	\$ 16	16.04
May, 2016		3,500.00	- 8	8	3,500.00	5.50	0.00458	S	3,500.00	\$ 16	16.04
June, 2016		3,500.00	-	8	3,500.00	5.50	0.00458	\$	3,500.00	\$ 16	16.04
July, 2016		3,500.00	· •	s	3,500.00	5.50	0.00458	\$	3,500.00	\$ 16	16.04
August, 2016	\$ 3,	3,500.00		8	3,500.00	5.50	0.00458	\$	3,500.00	\$ 16	16.04
September, 2016		3,500.00	- -	જ	3,500.00	5.50	0.00458	\$	3,500.00	\$ 16	16.04
October, 2016		3,500.00	•>	8	3,500.00	5.50	0.00458	\$	3,500.00	\$ 16	16.04
November, 2016	i	3,500.00	ı ₩	S	3,500.00	5.50	0.00458	s	3,500.00		16.04
December, 2016	\$ 3,	3,500.00	۱ حج	8	3,500.00	5.50	0.00458	S	3,500.00	\$ 16	16.04
January, 2017		3,500.00		↔	3,500.00	5.75	0.00479	\$	3,500.00		16.77
February, 2017		3,500.00	۱	8	3,500.00	5.75	0.00479	\$	3,500.00	\$ 16	16.77
March, 2017		3,500.00	·	89	3,500.00	5.75	0.00479	\$	3,500.00		16.77
April, 2017		3,500.00	ı €⁄3	89	3,500.00	5.75	0.00479	<del>5</del>	3,500.00	\$ 16	16.77
May, 2017		3,500.00	- 8	S	3,500.00	5.75	0.00479	S	3,500.00	\$ 16	16.77
June, 2017		3,500.00	· ·	8	3,500.00	5.75	0.00479	S	3,500.00	\$ 16	16.77
July, 2017		3,500.00	- -	69	3,500.00	6.25	0.00521	S	3,500.00	\$ 18	18.23
August, 2017		3,500.00	- ~	69	3,500.00	6.25	0.00521	\$	3,500.00	\$ 18	18.23
September, 2017	\$ 3,	3,500.00		65	3,500.00	6.25	0.00521	69	3,500.00	\$ 18	18.23
October, 2017		3,500.00	<u>.</u>	↔	3,500.00	6.25	0.00521	8	3,500.00	\$ 18	18.23
November, 2017		3,500.00	•	S	3,500.00	6.25	0.00521	€⁄3	3,500.00	\$ 18	18.23
December, 2017		3,500.00	-	65	3,500.00	6.25	0.00521	\$	3,500.00	\$ 18	18.23
January, 2018		3,500.00	- -	8	3,500.00	6.50	0.00542	\$	3,500.00	\$ 18	18.96
February, 2018	\$ 3,	3,500.00	- \$	<del>⊗</del>	3,500.00	6.50	0.00542	€9	3,500.00		18.96
March, 2018		3,500.00	- \$	8	3,500.00	6.50	0.00542	<del>∽</del>	3,500.00	\$ 18	18.96
April, 2018	\$ 3,	3,500.00	, \$	8	3,500.00	6.50	0.00542	<del>S</del>	3,500.00		18.96

May, 2018	89	3,500.00	€		64	3,500.00	6.50	0.00542	s	3,500.00	€9	18.96
June, 2018	8	3,500.00	8	-	8	3,500.00	6.50	0.00542	S	3,500.00	\$	18.96
July, 2018	85	3,500.00	\$		83	3,500.00	7.00	0.00583	69	3,500.00	\$	20.42
August, 2018	↔	3,500.00	↔		\$	3,500.00	7.00	0.00583	\$	3,500.00	\$	20.42
September, 2018	€9	3,500.00	\$	1	89	3,500.00	7.00	0.00583	\$	3,500.00	\$	20.42
October, 2018	8	3,500.00	8	,	€	3,500.00	7.00	0.00583	€>	3,500.00	S	20.42
November, 2018	8	3,500.00	\$		8	3,500.00	7.00	0.00583	\$	3,500.00	\$	20.42
December, 2018	S	3,500.00	€9		es.	3,500.00	7.00	0.00583	€9	3,500.00	€9	20.42
January, 2019	↔	3,500.00	↔	,	8	3,500.00	7.50	0.00625	\$	3,500.00	\$	21.88
February, 2019	↔	3,500.00	€9		\$	3,500.00	7.50	0.00625	\$	3,500.00	\$	21.88
March, 2019	↔	3,500.00	€	,	€3	3,500.00	7.50	0.00625	\$	3,500.00	\$	21.88
April, 2019	8	3,500.00	æ	1	\$	3,500.00	7.50	0.00625	€\$	3,500.00	€5	21.88
May, 2019	€>	3,500.00	↔	ı	ક્ક	3,500.00	7.50	0.00625	<del>⇔</del>	3,500.00	S	21.88
June, 2019	89	3,500.00	↔	ı	S	3,500.00	7.50	0.00625	8	3,500.00	8	21.88
July, 2019	છ	3,500.00	€9	,	&	3,500.00	7.50	0.00625	€>	3,500.00	<del>59</del>	21.88
Augut, 2019	€>	3,500.00	↔		89	3,500.00	7.50	0.00625	8	3,500.00	€>	21.88
September, 2019	es.	3,500.00	8	,	8	3,500.00	7.50	0.00625	8	3,500.00	89	21.88
December, 2019	S	3,500.00	es	,	ક્ક	3,500.00	7.50	0.00625	\$	3,500.00	€>	21.88
November, 2019	€>	3,500.00	8	-	S	3,500.00	7.50	0.00625	ss.	3,500.00	8	21.88
January, 2020	es.	3,500.00	8	-	\$	3,500.00	6.75	0.00563	8	3,500.00	\$	19.69
February, 2020	€>3	3,500.00	\$	-	S	3,500.00	6.75	0.00563	8	3,500.00	<del>\$</del>	19.69
March, 2020	es.	3,500.00	8	1	€9	3,500.00	6.75	0.00563	s	3,500.00	8	19.69
April, 2020	S	3,500.00	8	ı	€>	3,500.00	6.75	0.00563	<del>⇔</del>	3,500.00	€9	19.69
May, 2020	બ	3,500.00	8	ı	↔	3,500.00	6.75	0.00563	↔	3,500.00	€>	19.69
June, 2020	ક્ક	3,500.00	S	1	\$	3,500.00	6.75	0.00563	S	3,500.00	8	19.69
July, 2020	ક્ત	3,500.00	€5		89	3,500.00	5.25	0.00438	જ	3,500.00	€9	15.31
August, 2020	8	3,500.00	\$	1	<del>\$</del>	3,500.00	5.25	0.00438	S	3,500.00	8	15.31
September, 2020	\$	3,500.00	\$	ι	<del>S</del>	3,500.00	5.25	0.00438	S	3,500.00	↔	15.31

	15.51	15.31	10.01	1531		104125			3.500.00		1.041.25		4,541,25	ANGEST CONTRACTOR TO THE PARTY OF THE PARTY	
< < < < ·	\$ 3,500.00 \$	\$ 00,002,00	\$ 2,200.00	2 500 00 \$	\$ 00.00C.C	\$ 250000	30.000.0		The second American Harmon December 2020 S		December 2020:15	200000	TOTAL STIM DITE: S		
	0.00438		0.00438	0.400	0.00458		The second secon		Acome athroniah	त्त्राच्यावष्ट्रच प्याण <u>पष्ट्र</u> ा	ad Interest through	10tal Accided interest unough posterior	CL		
	5.25		5.25		5.25				, , A	I otal Accided	- V - 7 - L	Logi Acciu			
	3 500 00	2,200.00	3.500.00	2,2,2,6,7	3 500 00	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	3.500.00								
	6	9	4	>	¥	,	<b>~</b>								
	<b>4</b>	ا م	•	÷	•	9	Ų	9							
	00000	3,500.00	2 500 00	2,200.00	00 003 6	2,200.00	2 500 00	25,000,00							
	€	B	Ę	<del>^</del>	e	A	ø	9							
		October, 2020	2 2 2000	November, 2020	,	December, 2020	S LITTLE	TOTALS			!				

Mahoney adv. Mahoney	ahoney										
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	Shar	Shamus &					DEE1461	465 \$	5 250 00	Due April 2016	il 2016
Attorney Fees	Peabo	Peabody LLC	2015		9/1/2015	\$ 15,000.00	Newster.				
				<u>&gt;</u>	Monthly	Annual Legal	Y WORKING	Accrued	pə	Monthly	thily
Date Due	Amo	Amount Due	Payment	Ar	Arrearage	Interest Kate (norcent)	Interest rate as	Arrearage	age	Interest	.est
				Ę	00 030 3	5 50	0.00458	\$ 5.2	5.250.00	↔	24.06
April, 2016	€>	5,250.00	-	A	2,230.00	5.50	0.00458		5,250.00	s	24.06
May, 2016		5,250.00	- -	Ą	0,450.00	5.50	0.00458	\$ 5.2	5,250.00	€	24.06
June, 2016	€9	5,250.00	- -	Ą	00.0026	2.50	0.00458		5,250.00	69	24.06
July, 2016	↔	5,250.00	٠	<u>ب</u>	00.0075	0000	0.00458		5 250.00	64	24.06
August, 2016		5,250.00	١	<b>∞</b>	5,250.00	2.50	0.00458	\$ 5.2	5.250.00	€5	24.06
September, 2016	↔	5,250.00	٠	م	5,250.00	00.0	0.00158		5 250 00	SA	24.06
October, 2016	↔	5,250.00	8	S	5,250.00	5.50	0.00400	8	5 250 00		24.06
November, 2016	8	5,250.00	\$	S	5,250.00	0.50	0.00430		5 250 00	÷ €	24.06
December, 2016	es.	5,250.00	\$	8	5,250.00	5.50	0.00430		250.00		25.16
Tannary 2017	ક્ક	5.250.00	<b>.</b>	↔	5,250.00	5.75	0.004/9		20.00	9 6	25.16
Eabman, 2017	54	5.250.00	-	\$	5,250.00	5.75	0.00479		00.0076	9 6	27.10
March 2017	÷	5 250 00	8	\$	5,250.00	5.75	0.00479		5,250.00	٩	22.10
Maicu, 2017	9 6	5 250 00	<b>*</b>	€>	5,250.00	5.75	0.00479		5,250.00	γ (·	22.10
April, 2017	9 6	5 250 00	· •	8	5,250.00	5.75	0.00479		5,250.00	8	25.16
May, 2017	9 6	2,20,00		£.	5.250.00	5.75	0.00479		5,250.00		25.16
June, 2017	9 6	5 250 00		€2	5,250.00	6.25	0.00521	\$ 5,	5,250.00		27.34
July, 2017	9 6	5 250 00	į	8	5,250.00	6.25	0.00521		5,250.00		27.34
Sentember 2017	<b>↓</b>	5.250.00		S	5,250.00	6.25	0.00521	\$	5,250.00		27.34
September, 2017	┿	5 250 00	<b>∀</b>	S	5,250.00	6.25	0.00521		5,250.00	η,	47.74
October, 2017	9 6	2 250 00		69	5,250.00	6.25	0.00521		5,250.00	_	27.34
	+	00.00.24	9 6	64	5 250.00	6.25	0.00521	\$ 5,	5,250.00	_	27.34
December, 2017	188	2,420.00	9 6	€	5 250 00	6.50	0.00542		5,250.00	_	28.44
January, 2018	A 6	2,720.00	9 6	6	5 250 00	6.50	0.00542		5,250.00		28.44
February, 2018	A 6	00.052.2	9 €	9 64	5 250 00	6.50	0.00542	\$	5,250.00		28.44
March, 2018	<b>∕</b> 3 €	2,250.00	9 8	9 64	5.250.00	6.50	0.00542		5,250.00	8	28.44
April, 2018	<u>^</u>	0,007,0	9	<b>,</b>							

May, 2018	<del>\$</del>	5,250.00	\$	_	8	5,250.00	6.50	0.00542	8	5,250.00	64	28.44
June, 2018	↔	5,250.00	\$	1	€9	5,250.00	6.50	0.00542	\$	5,250.00	\$	28.44
July, 2018	<del>⇔</del>	5,250.00	\$		↔	5,250.00	7.00	0.00583	\$	5,250.00	↔	30.63
August, 2018	S	5,250.00	\$	-	\$	5,250.00	7.00	0.00583	S	5,250.00	8	30.63
September, 2018	<del>6/3</del>	5,250.00	\$	-	↔	5,250.00	7.00	0.00583	<del>69</del>	5,250.00	69	30.63
October, 2018	\$	5,250.00	\$	ŧ	\$	5,250.00	7.00	0.00583	S	5,250.00	8	30.63
November, 2018	S	5,250.00	8	-	<del>\$</del>	5,250.00	7.00	0.00583	∽	5,250.00	6 <del>9</del>	30.63
December, 2018	ક્ક	5,250.00	\$	t	↔	5,250.00	7.00	0.00583	€9	5,250.00	<del>69</del>	30.63
January, 2019	\$	5,250.00	\$	-	\$	5,250.00	7.50	0.00625	S	5,250.00	S	32.81
February, 2019	ક્ર	5,250.00	\$	ı	₩	5,250.00	7.50	0.00625	€9	5,250.00	89	32.81
March, 2019	∽	5,250.00	↔	1	\$	5,250.00	7.50	0.00625	↔	5,250.00	8	32.81
April, 2019	€>	5,250.00	\$	-	\$	5,250.00	7.50	0.00625	€9	5,250.00	8	32.81
May, 2019	↔	5,250.00	\$		S	5,250.00	7.50	0.00625	S	5,250.00	\$	32.81
June, 2019	€9	5,250.00	€	1	\$	5,250.00	7.50	0.00625	S	5,250.00	\$	32.81
July, 2019	↔	5,250.00	\$	-	\$	5,250.00	7.50	0.00625	S	5,250.00	S	32.81
Augut, 2019	જ	5,250.00	\$	Ŧ	\$	5,250.00	7.50	0.00625	ક્ક	5,250.00	\$	32.81
September, 2019	ક્ર	5,250.00	\$	_	8	5,250.00	7.50	0.00625	\$	5,250.00	\$	32.81
December, 2019	\$	5,250.00	\$	-	S	5,250.00	7.50	0.00625	S	5,250.00	\$	32.81
November, 2019	<del>&amp;</del>	5,250.00	8	ı	S	5,250.00	7.50	0.00625	ક્ર	5,250.00	S	32.81
January, 2020	S	5,250.00	8	,	↔	5,250.00	6.75	0.00563	ક્ક	5,250.00	\$	29.53
February, 2020	S	5,250.00	S	1	∽	5,250.00	6.75	0.00563	\$	5,250.00	\$	29.53
March, 2020	S	5,250.00	S	ı	ક્ક	5,250.00	6.75	0.00563	ક્ક	5,250.00	\$	29.53
April, 2020	S	5,250.00	S	_	↔	5,250.00	6.75	0.00563	<del>69</del>	5,250.00	\$	29.53
May, 2020	S	5,250.00	€	1	<del>⇔</del>	5,250.00	6.75	0.00563	\$	5,250.00	\$	29.53
June, 2020	S	5,250.00	\$	-	€9	5,250.00	6.75	0.00563	€⁄3	5,250.00	\$	29.53
July, 2020	S	5,250.00	\$	ı	↔	5,250.00	5.25	0.00438	69	5,250.00	ॐ	22.97
August, 2020	S	5,250.00	€>	1	ક્ત	5,250.00	5.25	0.00438	\$	5,250.00	\$	22.97
September, 2020	S	5,250.00	8	1	↔	5,250.00	5.25	0.00438	\$	5,250.00	\$	22.97

L			Ĺ	000000	1001	0.0000	6	000000	6	7007
	5.250.00		⊶	5,250.00	5.75	0.00438	<del>م</del>	3,430.00	9	44.71
2	250 00	5	S	5,250.00	5.25	0.00438	↔	5,250.00	8	22.97
	5 250 00		€2	5,250.00	5.25	0.00438	↔	5,250.00	8	22.97
	5.250.00	8	63	5,250.00			S	5,250.00	\$ 1,5	561.88
To the second se	And the second s	to the state of th								
					Total Acented	Total Accessed Arrests on through December 2020.	Dece	mber 2020-		5,250,00
					אסווססע דשוט ד		The state of the s			
					Total Accrue	Total Accrued Interest through December 2020:	l Decer	mber 2020:	9	1,561.88
							TALS	TOTAL SUMDUE:	9 \$	6,811.88
					12.57.7. (2.10.8.7.7. (2.10.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1					

Mahoney adv. Mahoney	honey						
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Dept. S							
S.	Shamus &			E	DEE1465	\$ 737.09	Due April 2017
Attorney Fees	Peabody LLC	2016	2/15/2016	7	Menthly		
			Monthly	Annual Legal	Monumy	Accrued	Monthly
Date Due	Amount Due	Payment	Arrearage	Interest Kate	Interest Kate as	Arrearage	Interest
		$\dashv$		(DOLCOLO)	0.00479	\$ 737.09	\$ 3.53
April, 2017	\$ 737.09			27.5	0.00479	\$ 737.09	
May, 2017	\$ 737.09				0.00179		\$ 3.53
June, 2017	\$ 737.09	$\dashv$	\$ 737.09		0.00521		\$ 3.84
July, 2017		-			0.00521		\$ 3.84
August, 2017		_	\$ /3/.09		0.00521		<b>└</b>
September, 2017			00.727		0.00521	\$ 737.09	\$ 3.84
October, 2017		_			0.00521	\$ 737.09	\$ 3.84
November, 2017	\$ 737.09	-			0.00521		L_
December, 2017	\$ 737.09		\$ 757.09	0.20	0.00542		8
January, 2018	\$ 737.09				0.00542		8
February, 2018	\$ 737.09				0.00542	\$ 737.09	50
March, 2018	\$ 737.09				0.00542		8
April, 2018	\$ 737.09	- \$ 6			0.00042	\$ 737.09	3.99
May, 2018	\$ 737.09	- \$ 6	\$ 737.09		0.00342		8 60
June, 2018	\$ 737.09			6.50	0.00342		\$
July, 2018	\$ 737.09				0.00583	\$ 737.09	s
August, 2018		-			0.00583		↓
September, 2018	s		\$ /3/.09	!	0.00583		_
October, 2018	8		9 /37.09		0.00583	\$ 737.09	9 \$ 4.30
November, 2018	S	┩			0.00583		<u> </u>
December, 2018	\$	<b>-</b>			0.00625		
January, 2019	\$ 737.09	4	\$ 757.09		509000		9 \$ 4.61
February, 2019	\$ 737.09				0.0025		<u> </u>
March, 2019	\$ 737.09	-			0.0002	\$ 737.09	9 \$ 4.61
April, 2019	\$ 737.09	- \$ 60	\$ /3/.09		22000		

4.61	4.61	4.61	4.61	4.61	4.61	4.61	4.15	4.15	4.15	4.15	4.15	4.15	3.22	3.22	3.22	3.22	3.22	3.22	178.28	737.09	178.28	915.38
\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	er 2020:	er 2020:	M DUE:
S	<del>\$</del>	\$	\$	<del>6</del> 9	<del>\$</del>	\$	<del>69</del>	<del>\$</del>	<del>\$</del>	<del>69</del>	\$	↔	<del>69</del>	\$	↔	\$	\$	<del>\$</del>	\$	Decemb	(Decemb	FOTAL SUM DUE:
0.00625	0.00625	0.00625	0.00625	0.00625	0.00625	0.00625	0.00563	0.00563	0.00563	0.00563	0.00563	0.00563	0.00438	0.00438	0.00438	0.00438	0.00438	0.00438		Total Accrued Arrearage through December 2020:	Total Accrued Interest through December 2020:	TO
7.50	7.50	7.50	7.50	7.50	7.50	7.50	6.75	6.75	6.75	6.75	6.75	6.75	5.25	5.25	5.25	5.25	5.25	5.25		Total Accrued	Total Accrue	
737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09			
ક્ક	S	69	8	\$	↔	€>	↔	S	↔	↔	S	↔	8	\$	↔	↔	↔	↔	\$			
-	ŀ	•	Ē	1	•	ì	1	τ	ŧ	1	1	ī	ı	1	1	1	ı	ı	-			
\$	\$	S	\$	S	S	es.	€9	S	ॐ	&>	S	↔	<del>S</del>	ક્ક	€9	ક્ક	S	↔	\$			
737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09	737.09			
<del>⇔</del>	S	\$	S	↔	↔	89	↔	↔	↔	643	↔	↔	<del>⇔</del>	↔	89	↔	<del>⇔</del>	ક્ત	S			
May, 2019	June, 2019	July, 2019	Augut, 2019	September, 2019	December, 2019	November, 2019	January, 2020	February, 2020	March, 2020	April, 2020	May, 2020	June, 2020	July, 2020	August, 2020	September, 2020	October, 2020	November, 2020	December, 2020	TOTALS TOTALS			

Mahoney adv. Manoney	ahoney									
D-13-477883-D								-		
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			7,00	2100/00/2		DEF1468	\$ 1,626.26	6.26	Due April 2017	1 2017
Attorney Fees	Thomas Keller R	eller R	2016	177/77	4	vironumy	4	70	Monthly	ΛĮ
Dofe Due	Amount Due	Due	Payment	Monthly	Interest Rate	Interest Rate as	Arrearage	و او	Interest	st
Date Date				Arrearage 0 160606	5 75	0.00479	\$ 1,62	1,626.26	\$	7.79
April, 2017	\$ 1,6	1,626.26	-			0.00479		1.626.26	S	7.79
May, 2017		1,626.26			-	0.00479		1 626.26	8	7.79
June, 2017	\$ 1,6	1,626.26	· S			0.00472		1.626.26	8	8.47
July, 2017	\$ 1,6	1,626.26	-			0.00221		1.626.26	89	8.47
August, 2017	\$ 1,6	1,626.26	5			0.00521		1 626.26	69	8.47
September, 2017	\$ 1,6	1,626.26	-		6.05	0.00221		1,626.26	8	8.47
October, 2017	\$ 1,6	1,626.26	·			0.00221		1 626.26	   	8.47
November, 2017	\$ 1,6	1,626.26	-	\$ 1,626.26		0.00221		1 626 26	54.	8.47
December, 2017	 	1,626.26	· S	Ì		0.00321		1 626 26	       	8.81
Tonnary 2018		1,626.26	-  -	\$ 1,626.26		0.00542	1,0	26.26	9 <del>6</del>	8 8 1
T. 1. 2010		1 626 26	·	\$ 1,626.26	6.50	0.00542		1,020.40	•	5   5
February, 2010		1 676 76	1		6.50	0.00542	\$ 1,6	1,626.26	احد	0.01
March, 2018		20,20			6.50	0.00542		1,626.26	·A	8.81
April, 2018		1,020.20		\$ 162626		0.00542		1,626.26	8	8.8
May, 2018		1,626.20	A			0.00542	\$ 1,6	1,626.26	<b>.</b>	8.81
June, 2018		1,626.26	•			0.00583		1,626.26	643	9.49
July, 2018		1,626.26	· ·			0.00583	\$ 1,6	1,626.26	€\$	9.49
August, 2018	8	1,626.26	<b>S</b>	1,020.20		0.00583		1,626.26	\$	9.49
September, 2018	s	1,626.26	1 A			0.00583		1,626.26	S	9.49
October, 2018	S	1,626.26	· ·			0.00583	\$ 1,6	1,626.26	\$	9.49
November, 2018	S	1,626.26	- I	07.070.70		0.00583		1,626.26	\$	9.49
December, 2018	S	1,626.26	_			0.00625		1,626.26	\$	10.16
January, 2019	\$	1,626.26		1,020.20	-	0.00625		1,626.26	S	10.16
February, 2019		1,626.26				0.00625		1,626.26	S	10.16
March, 2019	\$	1,626.26	<b>S</b>	1,020.20		0.00625		1,626.26	S	10.16
April, 2019		1,626.26	5	3 1,020		0.00625		1,626.26	s <sub>A</sub>	10.16
May, 2019	\$ 1	1,626.26	\$	\$ 1,626.26		>30000				

				6	20202	7.50	5,000,0	6/3	1,626.26		10.16
rune, 2019	&	1,626.26	8		1,020.20	02.7	\$ 6900.0	<b>€</b>	1 626.26	S	10.16
July, 2019	es.	1,626.26	ŧ <b>↔</b>	65)	1,626.26	00.7	50000		1 626 26		10.16
Augut, 2019	€9	1,626.26	- S	S	1,626.26	00.7	0.0000	9 64	1 626 26	· S	10.16
September, 2019	↔	1,626.26		8	1,626.26	00.7	0.00635	9 6	1 626 26		10.16
December, 2019	s>	1,626.26	ا ↔	€>	1,626.26	00.7	0.0000	9 6	1 626 26		10.16
November, 2019	↔	1,626.26	± <b>&gt;</b>	8	1,626.26	00.7	0.00023	÷ 6	1 626 26		9.15
аппату, 2020	8	1,626.26	; �	<del>\$</del>	1,626.26	6.75	0.00363	9 6	1 626.26	9 64	9.15
February 2020	€>	1,626.26	- \$	8	1,626.26	6.75	0.00565	9 6	1,020-20	9 6	9.15
March, 2020	8	1,626.26	۱	8	1,626.26	6.75	0.00563	ဂ ရ	1,020.20	9 6	9.15
Anril 2020	S	1,626.26	· •	↔	1,626.26	6.75	0.00563	A) 6	1,020.20	9 4	9.15
May 2020	S	1,626.26	· &	S	1,626.26	6.75	0.00563	A 6	1,020.20	9 6	915
1,me 2020	4	1,626.26	-	\$	1,626.26	6.75	0.00563	۰	1,020.20	9 G	7.17
11. 2020	9	1 626 26	5	83	1,626.26	5.25	0.00438	<b>₽</b>	1,020.20	A 6	7.11
July, 2020	<b>∌</b> 6	1 626 26	-	8	1,626.26	5.25	0.00438	€>	1,626.26	A .	11:
August, 2020	4	1,020.20	-	6	1,626.26	5.25	0.00438	&	1,626.26	<i>A</i>	7.11
September, 2020	_	1,020.20	+	3 6	1,626.26	525	0.00438	<b>⇔</b>	1,626.26	<b>⇔</b>	7.11
October, 2020	_+	1,626.26	$\dashv$	9 6	1,020:1	505	0.00438	S	1,626.26	S	7.11
November, 2020	<del>⊗</del>	1,626.26	· ·	7	1,020.20	20.2	0.00428	<b>€</b>	1,626.26	€9	7.11
December, 2020	\$	1,626.26		€?)	1,626.26	5.6	0.00-00	9 6	1,626.26	<i>6</i> /	393.35
TOTALS	\$	1,626.26	\$	\$	1,626.26			9			
				_		Posterior V. L. T. H.	T 4 2 - 1 4 2 - 1 4 4 TESTER THEN IN THE STORY	) Decei	mher 2020:	S	1,626.26
				-		Joral Accrueu	All calage unoug	Dage	mher 2020:	E Kasa	393.35
	_					Total Accrue	John Accrued Interest unfough December 2023		TIME PATE.	9	2.019.61
	_						בן   	TAL	IOTALSONI DOE:	9	
	_			$\frac{1}{1}$		1000					

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Dept. S				-							
Attorney Fees	Wynr	Wynn Las Vegas	2017	7	1/8/2017	\$ 40,000.00	DEF2176	જ	14,000.00	Due April 2018	11 2018
Date Due	Am	Amount Due	Payment		Monthly Arrearage	Interest Rate	Interest Rate as		Accrued Arrearage	Monthly Interest	hlly est
April. 2018	€>3	14,000.00	I €	8	14,000.00	6.50	0.00542	\$	14,000.00	\$	75.83
May, 2018	€5	14,000.00	5	8	14,000.00	6.50	0.00542	ક્ક	14,000.00	↔	75.83
June, 2018	8	14,000.00	<b>.</b>	€9	14,000.00	6.50	0.00542	\$	14,000.00	8	75.83
July, 2018	8	14,000.00	· •	€5	14,000.00	7.00	0.00583	↔	14,000.00	\$	81.67
August, 2018	₩	14,000.00		\$	14,000.00	7.00	0.00583	8	14,000.00	8	81.67
September, 2018	ક્ર	14,000.00	- ج	\$	14,000.00	7.00	0.00583	8	14,000.00	\$	81.67
October, 2018	S	14,000.00	1 €	↔	14,000.00	7.00	0.00583	↔	14,000.00	\$	81.67
November, 2018	<del>⇔</del>	14,000.00	9	\$	14,000.00	7.00	0.00583	8	14,000.00		81.67
December, 2018	S	14,000.00		8	14,000.00	7.00	0.00583	∽	14,000.00	↔	81.67
January, 2019	65	14,000.00	-	<del>6∕3</del>	14,000.00	7.50	0.00625	8	14,000.00	S	87.50
February, 2019	S	14,000.00	- -	€>	14,000.00	7.50	0.00625	\$	14,000.00	S	87.50
March, 2019	89	14,000.00	69	€>	14,000.00	7.50	0.00625	છ	14,000.00		87.50
April, 2019	↔	14,000.00	-	\$	14,000.00	7.50	0.00625	S	14,000.00		87.50
May, 2019	S	14,000.00	€	€9	14,000.00	7.50	0.00625	\$	14,000.00	જ	87.50
June, 2019	€>	14,000.00	€9	S	14,000.00	7.50	0.00625	€9	14,000.00	8	87.50
July, 2019	€>	14,000.00	•	89	14,000.00	7.50	0.00625	8	14,000.00	<b>⇔</b>	87.50
Augut, 2019	89	14,000.00	€	<del>⇔</del>	14,000.00		0.00625	65	14,000.00	<del>\$</del>	87.50
September, 2019	8	14,000.00	<u>-</u>	↔	14,000.00	7.50	0.00625	83	14,000.00	S	87.50
December, 2019	↔	14,000.00	·	8	14,000.00	7.50	0.00625	8	14,000.00	S	87.50
November, 2019	ss	14,000.00	·	\$	14,000.00	7.50	0.00625	8	14,000.00	€>	87.50
January, 2020	\$	14,000.00	- -	€>	14,000.00	6.75	0.00563	∽	14,000.00	S	78.75
February, 2020	s	14,000.00	-	\$	14,000.00	6.75	0.00563	↔	14,000.00	€9	78.75
March, 2020	643	14,000.00	-	€9	14,000.00	6.75	0.00563	8	14,000.00		78.75
April, 2020	↔	14,000.00	ا ج	S	14,000.00	6.75	0.00563	8	14,000.00		78.75
May, 2020	↔	14,000.00	- \$	\$	14,000.00	6.75	0.00563	8	14,000.00	€>	78.75
June, 2020	ક્ર	14,000.00	- \$	\$	14,000.00	6.75	0.00563	8	14,000.00	8	78.75

61.25	61.25	61.25	61.25	61.25	61.25	2,520.00	14,000.00	2,520.00	16,520.00
€3	↔	es>	s	8	€>3	\$	9	69	ક
14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	cember 2020:	cember 2020:	TOTAL SUM DUE: S
€>	€\$	↔	8	8	69	es	h De	h De	TAI
0.00438	0.00438	0.00438	0.00438	0.00438	0.00438		Total Accrued Arrearage through December 2020:	Total Accrued Interest through December 2020.	OL .
5.25	5.25	5.25	5.25	5.25	5.25		Total Accrued	Total Accrue	
14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00	14,000.00			
8	↔	\$	S	€9	€9	5			
- +	-	-	- \$	-	-	- 8			
14,000.00	14,000.00		14,000.00	14,000.00	14,000.00	14,000.00			
€>	↔	\$	8	€>	↔	\$			
July, 2020	August, 2020	September, 2020	October, 2020	November, 2020	December, 2020	TOTALS \$			

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		-					
Attorney Fees	Wynn Las Vegas	2018	1/19/2018	\$ 40,000.00	DEF2174	\$ 14,000.00	Due April 2019
100			Monthly	Annual Legal	Monthly	Accrued	Monthly
Date Due	Amount Due	Fayment	Arrearage	interest Kate (percent)	Interest rate as	Arrearage	Interest
April. 2019	\$ 14,000.00	1	\$ 14,000.00	7.50	0.00625	\$ 14,000.00	\$ 87.50
May 2019	7+	-	#REF!	7.50	0.00625	\$ 14,000.00	\$ 87.50
June, 2019	#REF!	6-5	#REF!	7.50	0.00625	\$ 14,000.00	\$ 87.50
July, 2019	\$ 14,000.00	-	\$ 14,000.00	7.50	0.00625	\$ 14,000.00	
Augut, 2019	\$ 14,000.00	1	\$ 14,000.00	7.50	0.00625	\$ 14,000.00	-
Sentember, 2019		5	\$ 14,000.00	7.50	0.00625	\$ 14,000.00	\$ 87.50
December, 2019		59	\$ 14,000.00	7.50	0.00625	\$ 14,000.00	\$ 87.50
November 2019		5	\$ 14,000.00	7.50	0.00625	\$ 14,000.00	\$ 87.50
January 2020		5	\$ 14,000.00	6.75	0.00563	\$ 14,000.00	\$ 78.75
February, 2020		- \$	\$ 14,000.00	6.75	0.00563	\$ 14,000.00	
March, 2020		\$	\$ 14,000.00	6.75	0.00563		
April, 2020		ı ∽	\$ 14,000.00	6.75	0.00563		€5
May, 2020	\$ 14,000.00		\$ 14,000.00	6.75	0.00563		89
June, 2020	\$ 14,000.00	۱	\$ 14,000.00	6.75	0.00563		
July, 2020	\$ 14,000.00	-	\$ 14,000.00	5.25	0.00438		
August, 2020	\$ 14,000.00	ı ↔	\$ 14,000.00	5.25	0.00438		8
September, 2020	\$ 14,000.00	·	\$ 14,000.00	5.25	0.00438		<b>S</b>
October, 2020	\$ 14,000.00	۱	\$ 14,000.00	5.25	0.00438	\$ 14,000.00	\$ 61.25

6	ام	C 8 C 104	9	1 540 00	•	ψ.	35500 100 TO 100	14,000.00		1.540.00		15 540 00	9	
C C C C F F	\$ 14,000.00	14 000 00	14,000.0	17 000 00	0.000.ET &			h December 202		h December 2021		THE CITY DIT	I O LAL SUMIDUES	
00000	0.00438	000	0.00438					A - A - A - A - A - A - A - A - A - A -	Old Account All Calago amongs possess	d Tatorost through	John Accrued Illefoot unough Example 2000		IOL	
	5.25		5.25					Early Area	Total Accided	* E	IOTAL ACCTUR			
	14 000.00	22:226:1	14,000.00		14.000.00							7	500 600 800	
	4	)	<i>₩</i>	<del>)</del>	٠. د									
		4,000.00	9 000 00 F	14,000.00	\$ 00 000 71									
	0000	November, 2020   3	0000	December, 2020   3	TOTATO	P CTWIN &								

THE CONTRACTOR	,										
D-13-477883-D											
Dept. S											
	Golden			_			DEE1062	6	8 750 00	Due A	Due April 2019
	Entertainment		2018		6/8/2018	\$ 25,000.00	UEFIONS	9	20102160		
						Annual Legal	Monthly	Ac	Accrued	Mζ	Monthly
	A mount Due	411	Pavment		Monthly	Interest Rate	Interest Rate as	Arr	Arrearage	T.	Interest
Date Due	Amnome	}		¥	Arrearage	(percent)	Factor				
		4		6	075000	7.50	0.00625	<del>69</del>	8,750.00	€>	54.69
April, 2019		-		A 6	0,750.00	7.50	0.00625	ક્ક	8,750.00	<b>↔</b>	54.69
May, 2019	\$ 8,750.00	-	· ·	9 6	0,750.00	7.50	0.00625	€>	8,750.00	S	54.69
June, 2019			<b>S</b>	A (	0,750.00	7.50	0.00625	s	8,750.00	\$	54.69
July, 2019	\$ 8,750.00		-	A .	8,750.00	05.7	509000	69	8,750.00	€9	54.69
Augut, 2019	\$ 8,750.00		69	<u>ب</u> [م	8,750.00	7.50	0.00625	8	8,750.00	<u> </u>	54.69
September, 2019	\$ 8,750.00	8	-	<u> </u>	8,750.00	05.7	0.00625	89	8,750.00	\$	54.69
December, 2019	\$ 8,750.00	000	۱ ج	8	8,750.00	05.7	0.00625	69	8,750.00	89	54.69
November, 2019	\$ 8,750.00	00.0	€	S	8,750.00		0.00563	6	8.750.00	₩	49.22
Tannary, 2020	\$ 8,750.00	0.00	5	8	8,750.00		0.00563	) w	8.750.00	<u> </u>	49.22
February, 2020	 	0.00	-	S	8,750.00	0.75	0.00563	6	8.750.00	S	49.22
March, 2020	\$ 8,750.00	0.00	· •	S	8,750.00	6.75	0.00563	. S	8,750.00	<u> </u>	49.22
April, 2020		0.0	٠	S	8,750.00	27.0	0.00563	€5	8,750.00	<u> </u>	49.22
May 2020	\$ 8,750.00	0.00	-	8	8,750.00		0.00563	9	8 750.00	\$	49.22
Tune, 2020		8,750.00	· •	€\$	8,750.00		0.00303	9 64	8,750.00		38.28
July, 2020		8,750.00	•	<b>6</b>	8,750.00	5.75	0.00438	69	8,750.00		38.28
August, 2020	\$ 8,75	8,750.00	·	<b>S</b>	8,750.00		0.00438	<del>\</del>	8,750.00	<b>!</b>	38.28
September, 2020	<del>6/3</del>	8,750.00	€ <del>S</del>	A 6	8,750.00		0.00438	s	8,750.00	\$ 0	38.28
October, 2020	S	8,750.00	€9	A			0.00438	S	8,750.00	\$ 0	38.28
November, 2020	<del>69</del>	8,750.00	ا ج	<u>ام</u>			0.00438	69	8,750.00	\$ 0	38.28
December 2020	S	8,750.00	· S	69			0.51.0050	. 4	8.750.00	\$	962.50
TOTALS	\$	8,750.00	\$	69	8,750.00			9		\$ \$	
				+		Total Accrite	Total Accined Arrearage through December 2020:	th Dec	smber 2020	s :0	8,750.00
				+		Total Acr	Total Accrined Interest through December 2020:	th Dec	ember 2020	O: S	962.50
				+				TAL	TOTAL SUM DUE:	S: S	9,712.50
				_			ľ	1. C. C. C. C. C. C. C. C. C. C. C. C. C.	Conviction of Charles and Conviction of the Conv		

World         Payment         Annual Legal         Monthly Interest Rate           world         Arrearage         (percent)         Interest Rate           8,134.57         \$         28,134.57         6.75         0.00563           18,134.57         \$         28,134.57         6.75         0.00563           18,134.57         \$         28,134.57         6.75         0.00563           18,134.57         \$         28,134.57         6.75         0.00438           18,134.57         \$         28,134.57         6.75         0.00438           18,134.57         \$         28,134.57         6.75         0.00438           18,134.57         \$         28,134.57         5.25         0.00438           18,134.57         \$         28,134.57         5.25         0.00438           18,134.57         \$         28,134.57         5.25         0.00438           18,134.57         \$         28,134.57         5.25         0.00438           18,134.57         \$         28,134.57         5.25         0.00438           18,134.57         \$         28,134.57         5.25         0.00438           18,134.57         \$         28,134.57         0.00438	World         Annual Legal         Monthly         Annual Legal         Monthly         Accrued         Mostland           unt Due         Payment         Arrearage         (percent)         Factor         Arrearage         Interest Rate as pract and practical practica	Mahoney adv. Mahoney	ney						
e         Payment         Annual Legal         Monthly Derert Rate         Interest Rate Interest Rate as Parcarage         Arrearage         Interest Rate percent)         Annual Legal         Monthly Decremed         Arrearage         Interest Rate as Pactor         Interest Rate as Pactor         Arrearage         Interest Rate as Pactor         Interest Rate as Pactor         Arrearage         Interest Rate as Pactor         Interest Intrough December 2020: 5         Interest Intrough December 2020: 5	e         Payment         Monthly         Interest Rate arange         Monthly (percent)								
e         Payment Arrearage         Monthly Interest Rate (percent)         Arrearage (percent)         Monthly Interest Rate (percent)         Arrearage (percent)         Monthly Interest Rate (percent)         Arrearage (percent)         Monthly Interest Rate (percent)         Arrearage (percent)         Monthly Interest Rate (percent)         Arrearage (percent)         Monthly Interest Rate (percent)         Arrearage (percent)         Monthly Interest through December 2020: \$         Interest Rate (percent)         Monthly Interest through December 2020: \$         Interest Rate (percent)         Monthly Interest through December 2020: \$         Interest Rate (percent)         Monthly Interest through December 2020: \$           \$ 28,134.57         \$ 28,134	Payment         Monthly         Arrearage (percent)         Monthly         Accrued         Monthly           7         \$ 28,134.57         Interest Rate (percent)         Factor         Accrued         Monthly           57         \$ 28,134.57         \$ 28,134.57         \$ 28,134.57         \$ 100563         \$ 28,134.57         \$ 100563         \$ 28,134.57         \$ 100563         \$ 28,134.57	, I							
e         Payment         Annual Legal         Monthly Interest Rate         Arrearage (percent)         Arrearage (percent)         Arrearage (percent)         Arrearage (percent)         Arrearage (percent)         Arrearage (percent)         Ractor         Arrearage (percent)         Factor         Payment         Arrearage (percent)         Factor         Ractor         Interest Rate as (percent)         Arrearage (percent)         Ractor         Interest Rate as (percent)         Arrearage (percent)         Interest Rate as (percent)	e         Payment         Annual Legal         Monthly Interest Rate         Arrearage (percent)         Monthly Interest Rate         Interest Rate as (percent)         Arrearage (percent)         Monthly Interest Rate (percent)         Arrearage (percent)         Monthly (percent)         Interest Rate as (parcent)         Arrearage (percent)         Interest Rate as (parcent)         Arrearage (percent)         Interest Rate as (parcent)         Arrearage (percent)         Interest Rate as (parcent)         Arrearage (parcent)         Interest Rate as (parcent)         Arrearage (parcent)         Interest Rate as (parcent)         Arrearage (parcent)         Interest Rate as (parcent)         In	1	11/2-14	2019	1/9/2020		DEF1756		Due April 2020
\$         28,134.57         6.75         0.00563         \$         28,134.57         \$           \$         -         \$         28,134.57         6.75         0.00563         \$         28,134.57         \$           \$         -         \$         28,134.57         6.75         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57 <th>\$         28,134.57         6.75         0.00563         \$         28,134.57         \$           \$         -         \$         28,134.57         6.75         0.00563         \$         28,134.57         \$           \$         -         \$         28,134.57         6.75         0.00563         \$         28,134.57         \$           \$         -         \$         28,134.57         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         \$         28,134.57</th> <th>3 B</th> <th>nount Due</th> <th>Payment</th> <th>Monthly Arrearage</th> <th></th> <th>Monthly Interest Rate as Factor</th> <th>Accrued Arrearage</th> <th>Monthly Interest</th>	\$         28,134.57         6.75         0.00563         \$         28,134.57         \$           \$         -         \$         28,134.57         6.75         0.00563         \$         28,134.57         \$           \$         -         \$         28,134.57         6.75         0.00563         \$         28,134.57         \$           \$         -         \$         28,134.57         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         5.25         0.00438         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         \$         28,134.57         \$           \$         -         \$         28,134.57         \$         \$         28,134.57	3 B	nount Due	Payment	Monthly Arrearage		Monthly Interest Rate as Factor	Accrued Arrearage	Monthly Interest
\$       -       \$       28,134.57       6.75       0.00563       \$       28,134.57       \$         \$       -       \$       28,134.57       6.75       0.00563       \$       28,134.57       \$         \$       -       \$       28,134.57       6.75       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       \$       28,134.57       \$       \$         \$       -       \$       28,134.57       \$       \$       28,134.57       \$         \$       -       \$       28,134.57       \$       \$ <td>\$       -       \$       28,134.57       6.75       0.00563       \$       28,134.57       \$         \$       -       \$       28,134.57       6.75       0.00563       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       \$       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       \$       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       \$       0.00438       \$       28,134.57       \$         \$       -       \$       28,</td> <td>ļ</td> <td></td> <td>•</td> <td></td> <td>6.75</td> <td>0.00563</td> <td></td> <td></td>	\$       -       \$       28,134.57       6.75       0.00563       \$       28,134.57       \$         \$       -       \$       28,134.57       6.75       0.00563       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       5.25       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       \$       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       \$       0.00438       \$       28,134.57       \$         \$       -       \$       28,134.57       \$       0.00438       \$       28,134.57       \$         \$       -       \$       28,	ļ		•		6.75	0.00563		
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S. S.	Selection Selections Security			5					State of Contract
S	A SEMINAR SHIPPING					Louise A Living	Arrestrate throllo	December 2020	S
S	S. Zuhmanger					John Accided	All Carago mode	h December 2020	\$
		, 1				Total Pict		TAL SUM DUE	S

						: :			_
Mahoney adv. Mahoney	(ahone)	7							
D-13-477883-D									Ι
Dept. S									T
*		-	0100	6/6/2019	\$ 25.000.00	DEF1724	\$ 8,750.00	Due April 2020	ഉ
	Resorts	Resorts World	6107			Monthly			
				Monthly	Annual Legal	INTORUMINA Tratorect Rate as	Accrued	Monthly	771
Date Due	Amo	Amount Due	Payment	Arrearage	Interest Kate (percent)	Factor F	Arrearage	Interest	
			•	00 0528 0	6.75	0.00563	\$ 8,750.00	\$ 49.22	<u>ما</u>
April, 2020	S	8,750.00	, ,		77.9	0.00563	\$ 8,750.00	\$ 49.22	7
May, 2020	<del>&amp;</del>	8,750.00	·		51.9	0.00563	\$ 8,750.00	\$ 49.22	7
June, 2020	€>	8,750.00	-		0.70	0.00303		\$ 38.28	∞ ∞
Fr.1x, 2020	er.	8.750.00	5	\$ 8,750.00	5.25	0.00450		÷ 6	ŏ
July, 2020	) • •	0 750 00	9	\$ 8.750.00	5.25	0.00438	\$ 8,750.00	9	श
August, 2020		8,730.00	9 6		5.25	0.00438	\$ 8,750.00	64	χĮ
September, 2020	8	8,750.00	_		505	0.00438	\$ 8,750.00	38.28	<u></u> χ
October, 2020	S	8,750.00	ı •>>		702	0.00438	\$ 8,750.00	38.28	8
November, 2020	<del>\$</del> ?	8,750.00	\$		2.6	0.00438	\$ 750.00	38.28	8
December 2020	8	8,750.00	-S	8,750.00	C7.C	0.500.0		47734	22
TOTALS		8,750.00	- 8	8,750.00			00.007.50	•	
							December 707	8.750.00	00
					Total Accrued	Total Accrued Arrearage unough December 2020:		9 6	7
					Total Accru	Total Accrued Interest through December 2020.	n December 2020	9 6	
	-						TOTAL SUM DUE:	#C/71'6	Į.

## EXHIBIT "B"

Print QuickPay activity table	ctivity table				
ment Activity for I	teceived Money,	ment Activity for Received Money, sorted by date received, most recent	ost recent		Amount
Date received	Status	Sender	Type	Actions	1
Nov 11, 2020	Completed	BART MAHONEY	Real-time	See details	\$500.00
Oct 22, 2020	Completed	BART MAHONEY	Real-time	See details	\$591.00
Oct 7, 2020	Completed	BART MAHONEY	Real-time	See details	\$500.00
Sep 21, 2020	Completed	BART MAHONEY	Real-time	See details	\$591.00
Sep 6, 2020	Completed	BART MAHONEY	Real-time	See details	\$500.00
Aug 20, 2020	Completed	BART MAHONEY	Real-time	See details	\$591.00
Aug 6, 2020	Completed	BART MAHONEY	Real-time	See details	\$500.00
Jul 23, 2020	Completed	BART MAHONEY	Real-time	See details	\$591.00
Jul 9, 2020	Completed	BART MAHONEY	Real-time	See details	\$500.00

Chase

ment Activity for F	eceived Money, s	ment Activity for Received Money, sorted by date received, most recent	ost recent		
Date received	Status	Sender	Туре	Actions	Amount
Jun 6, 2020	Completed	BART MAHONEY	Real-time	See details	\$500.00
May 15, 2020	Completed	BART MAHONEY	Real-time	See details	\$500.00
May 4, 2020	Completed	BART MAHONEY	Real-time	<u>See details</u>	\$591.00
Apr 25, 2020	Completed	BART MAHONEY	Real-time	<u>See details</u>	\$500.00
Apr 16, 2020	Completed	BART MAHONEY	Real-time	See details	\$591.00
Apr 4, 2020	Completed	BART MAHONEY	Real-time	See details	\$591.00
Mar 19, 2020	Completed	BART MAHONEY	Real-time	See details	\$291.00
Mar 8, 2020	Completed	BART MAHONEY	Real-time	See details	\$800.00
Feb 10, 2020	Completed	BART MAHONEY	Real-time	See details	\$1,091.00
Jan 28, 2020	Completed	BART MAHONEY	Real-time	See details	\$1,091.00

ment Activity for J	Received Money,	ment Activity for Received Money, sorted by date received, most recent	ost recent Type	Actions	Amount
	Completed	BART MAHONEY	Real-time	See details	\$1,091.00
	Completed	BART MAHONEY	Real-time	See details	\$1,091.00
	Completed	BART MAHONEY	Real-time	See details	\$1,091.00
	Completed	BART MAHONEY	Real-time	See details	\$1,092.00
	Completed	BART MAHONEY	Real-time	See details	\$891.00
	Completed	BART MAHONEY	Real-time	See details	\$200.00
	Completed	BART MAHONEY	Real-time	See details	\$600.00
	Completed	BART MAHONEY	Real-time	See details	\$1,500.00
	<b>4</b>	AVIIOY	You've reached the end of your activity.	ur activity.	

You've reached the end of your acuvity.

FDF Name: Kimberly A. Stutzman, Esq. Address: 2470 St. Rose Pkwy., #206 Henderson, Nevada 89074 Phone: (702) 990-6448 Email: rsmith@radfordsmith.com Attorney for Defendant Nevada State Bar No. 002791		11/3 Ste	ctronically Filed 30/2020 4:14 PM ven D. Grierson ERK OF THE COURT
Eighth Clark C	Judicial District		
Bartholomew M. Mahoney, Jr. Plaintiff,  vs. Bonnie M. Mahoney Defendant.		se No. <u>D-13-47783-D</u>	
<ul> <li>A. Personal Information:</li> <li>1. What is your full name? (first, middle, let)</li> <li>2. How old are you? 49</li> <li>4. What is your highest level of education</li> <li>B. Employment Information:</li> <li>1. Are you currently employed/ self-employed</li> </ul>	3. w nat College Degree  Dyed? (\(\mathbb{D}\) check one)	honey is your date of birth?	
Date of Hire Employer Name	Job Title	Work Schedule (days)	Work Schedule (shift times)
<i>W</i>	What agency certified What is the nature of	l you disabled? your disability?	for less than 2 years,
complete the following information.  Prior Employer: Grill Concepts Inc Reason for Leaving: position was terminate	Data of Hira 12/11	/2019 Date of Term	nination: 04/16/2020

Rev. 8-1-2014

# **Monthly Personal Income Schedule**

# A. Year-to-date Income.

As of the pay period ending 04/16/2020 my gross year to date pay is 17742.20 ...

# B. Determine your Gross Monthly Income.

# Hourly Wage

ou	riy wage		 		г——					<u> </u>	
	Hourly Wage	Number of hours worked per week	\$0.00 Weekly Income	×	52 Weeks	=	\$0.00 Annual Income	•	12 Months	==	\$0.00 Gross Monthly Income

#### Annual Salary

Annual Income	÷ 12 Months	= \$0.00 Gross Monthly Income
---------------	----------------	-------------------------------

# C. Other Sources of Income.

Source of Income	Frequency	Amount	12 Month Average
Annuity or Trust Income			
Bonuses			
Car, Housing, or Other allowance:			
Commissions or Tips:			
Net Rental Income:			
Overtime Pay			
Pension/Retirement:			
Social Security Income (SSI):			
Social Security Disability (SSD):			
Spousal Support		1091	\$1,091.00
Child Support	Monthly	1091	,,,,,,
Workman's Compensation		\$450.00	\$900.00
Other: unemployment	Bi- Monthly	\$450.00	\$1,991.00
Total A	verage Other Incom	e Received	\$1,991.00

D and C above	\$1,991.00
Total Average Gross Monthly Income (add totals from B and C above	7
Total Average Gross Monthly	

# D. Monthly Deductions

	1	ype of Deduction	Amount
1.	Court Ordered Child Sup	port (automatically deducted from paycheck)	
2.	Federal Health Savings I	Plan	
3.	Federal Income Tax		
4.	Health Insurance Fo	mount for you: or Opposing Party: or your Child(ren):	0.00
5.	Life, Disability, or Other	Insurance Premiums	
6.	Medicare		
7.	Retirement, Pension, IRA	A, or 401(k)	
8.	Savings		100000000000000000000000000000000000000
9.	Social Security		
10.	Union Dues		
11.	Other: (Type of Deduction	on)	
	1	Total Monthly Deductions (Lines 1-11)	0.00

# Business/Self-Employment Income & Expense Schedule

#### A. Business Income:

What is your average gross (pre-tax) monthly income/revenue from self-employment or businesses? \$0.00

# B. Business Expenses: Attach an additional page if needed.

Type of Business Expense	Frequency	Amount	12 Month Average
Advertising			
Car and truck used for business			
Commissions, wages or fees			
Business Entertainment/Travel			
Insurance			
Legal and professional	1		
Mortgage or Rent			
Pension and profit-sharing plans			
Repairs and maintenance			
Supplies			
Taxes and licenses (include est. tax payments)			
Utilities			
Other:			
	Total Average B	usiness Expenses	0.00

# Personal Expense Schedule (Monthly)

A. Fill in the table with the amount of money you spend each month on the following expenses and check whether you pay the expense for you, for the other party, or for both of you.

Expense	Monthly Amount I Pay	For Me	Other Party	For Both
Alimony/Spousal Support	180.00	<b>V</b>		
Auto Insurance	290.00	<b>'</b>		
Car Loan/Lease Payment	380.00	<b>'</b>		
Cell Phone		,		
Child Support (not deducted from pay)	50.00	<b>V</b>		
Clothing, Shoes, Etc	400.00	V		
Credit Card Payments (minimum due)	0.00	V		<u> </u>
Dry Cleaning	100.00	V		
Electric	300.00	<b>V</b>		
Food (groceries & restaurants)	75.00	V		
Fuel	75.00	+		
Gas (for home)		-		
Health Insurance (not deducted from pay)				
НОА				
Home Insurance (if not included in mortgage)				
Home Phone	60.00	V		
Internet/Cable	00.00	<del></del>		
Lawn Care	77.00	1		
Membership Fees	75.00	- V	_	
Mortgage/Rent/Lease	500.00			
Pest Control				
Pets	75.00			
Pool Service				
Property Taxes (if not included in mortgage)				
Security				
Sewer				_
Student Loans				_
Unreimbursed Medical Expense				
	80.00		+	
Water Other: Loans	500.00			
Total Monthly Expenses	3,065.00			

#### **Household Information**

A. Fill in the table below with the name and date of birth of each child, the person the child is living with, and whether the child is from this relationship. Attached a separate sheet if needed.

	Child's Name	Child's DOB	Whom is this child living with?	Is this child from this relationship?	Has this child been certified as special needs/disabled?
1 <sup>st</sup>	Brigitte C. Mahoney	10-29-01	Mom	Yes	No
2 <sup>nd</sup>	Sophia J. Mahoney	06-12-04	Mom	Yes	No
3 <sup>rd</sup>					
4 <sup>th</sup>					

**B.** Fill in the table below with the amount of money you spend each month on the following expenses for each child.

Type of Expense	1st Child	2 <sup>nd</sup> Child	3 <sup>rd</sup> Child	4 <sup>th</sup> Child
Cellular Phone	124.00	124.00		
Child Care				
Clothing	50.00	50.00		
Education	200.00			
Entertainment	50.00	50.00		
Extracurricular & Sports	40.00	40.00		
Health Insurance (if not deducted from pay)			<u> </u>	
Summer Camp/Programs				
Transportation Costs for Visitation				
Unreimbursed Medical Expenses	200.00			
Vehicle				
Other:				
Total Monthly Expenses	664.00	264.00	0.00	0.00

C. Fill in the table below with the names, ages, and the amount of money contributed by all persons living in the home over the age of eighteen. If more than 4 adult household members attached a separate sheet.

Name	Age	Person's Relationship to You (i.e. sister, friend, cousin, etc)	Monthly Contribution

# Personal Asset and Debt Chart

A. Complete this chart by listing all of your assets, the value of each, the amount owed on each, and whose name the asset or debt is under. If more than 15 assets, attach a separate sheet.

	whose name the asset of debt				1		Whose Name is on the Account?
ine	Description of Asset and Debt Thereon	Gross Value		Total Amount Owed		Net Value	You, Your Spouse/Domestic Partner or Both
_		\$14,500.00	-	\$19,516.94		\$ -5,016.94	Self
١.	2017 Volkswagen Jetta	\$	1-1	\$		\$ 0.00	
2.			1_	\$	=	\$ 0.00	
3.		\$	1.	\$	=	\$ 0.00	
4.		\$	+-	\$	<b>†</b> =	\$ 0.00	100 100 100 100
5.		\$	-	\$	†=	\$ 0.00	
6.		\$	+	\$	†=	\$ 0.00	
7.		\$		\$	†=	\$ 0.00	
8.		\$	- -	\$	+=	\$ 0.00	
9.		\$	<u>-</u>	\$	+=	4.2.2.	
10.		\$	+-	6	=		
11.		\$	<del> </del> -	r)	+	\$ 0.00	
12		\$	+	6	$\dashv$	\$ 0.00	
13		\$	_ -	+		= \$ 0.00	
14		\$	-+-	- \$	-+	= \$ 0.00	
15		\$		\$	$\dashv$		
	Total Value of Assets (add lines 1-15)	\$ 14,500.00		\$ 19,516.94		\$ -5,016.94	

B. Complete this chart by listing all of your unsecured debt, the amount owed on each account, and whose name the debt is under. If more than 5 unsecured debts, attach a separate sheet.

Line #	Description of Credit Card or Other Unsecured Debt	Total Amount owed	Whose Name is on the Account? You, Your Spouse/Domestic Partner or Both
ነ	Credit Cards (capital one, dept stores)	\$ 8,754.00	Self
2.		\$ 13,633.30	self
3.	Attorney Fees Loans (Parents, J. Lee, F. Shipp, B. Wheeler)	\$ 37,000.00	Self
	Loans (Parents, ). Lee, P. Shipp, D. Walestay	\$	
4.		\$	
5.		\$	
6.	tal Unsecured Debt (add lines 1-6)	\$ 59,387.30	

# **CERTIFICATION**

Attorney	Informa	tion: Complete the following sentences:						
	1. I	(have/have not) have	retained an attorney for this case.					
	2. A	As of the date of today, the attorney has been paid a total of \$5,000.00 on my behalf.						
	3. I	I have a credit with my attorney in the amount of \$						
	4. I	I currently owe my attorney a total of \$13,633.30						
	5. I	owe my prior attorney a total of \$						
IMPORT	rant: R	ead the following paragraphs carefully and in	nitial each one.					
	instruction I guaran	ry that I have read and followed all Form. I understand that, by my signature, this Form. I also understand that if I to punishment, including contempt of						
		I have attached a copy of my 3 most rece	ent pay stubs to this form.					
		I have attached a copy of my most statement to this form, if self-employed.	recent YTD income statement/P&L					
	bm	I have not attached a copy of my pay stu unemployed.	bs to this form because I am currently					
	/s/ Bonr	nie Mahoney	11/30/2020					
	Signature	>	Date					

#### CERTIFICATE OF SERVICE

I hereby declare under the penalty of perjury of the State of	Nevada that the following is true and
correct:	
That on (date) November 30, 2020	, service of the General Financial
Disclosure Form was made to the following interested parties	in the following manner:
☐ Via 1 <sup>st</sup> Class U.S. Mail, postage fully prepaid addressed as	s follows:
✓ Via Electronic Service, in accordance with the Master Sebmmlv27@gmail.com	ervice List, pursuant to NEFCR 9, to:
☐ Via Facsimile and/or Email Pursuant to the Consent of	Service by Electronic Means on file
herein to:	
Executed on the 30 day of November , 2020.	K. Stidzman Signature

Steven D. Grierson NOEJ 1 RADFORD J. SMITH, CHARTERED KIMBERLY A. STUTZMAN, ESQ. Nevada State Bar No. 014085 3 2470 St. Rose Parkway Suite 206 Henderson, Nevada 89014 Phone: (702) 990-6448; Fax: (702) 990-6456 Email: kstutzman@radfordsmith.com 6 Attorneys for Defendant 7 DISTRICT COURT FAMILY DIVISION 8 CLARK COUNTY, NEVADA 9 CASE NO.: D-13-477883-D BARTHOLOMEW M. MAHONEY, JR., 10 DEPT NO.: S 11 Plaintiff, 12 VS. 13 BONNIE M. MAHONEY, 14 15 Defendant. 16 NOTICE OF ENTRY OF FINDINGS OF FACT, CONCLUSIONS OF LAW, ORDER AND JUDGMENT FROM THE DECEMBER 3, 2020 EVIDENTIARY 17 HEARING 18 PLEASE TAKE NOTICE that on the 24th day of December 2020, the Honorable 19 20 Vincent Ochoa entered the Findings of Fact, Conclusions of Law, Order and Judgment 21 From the December 3<sup>rd</sup>, 2020 Evidentiary Hearing, a copy of which is attached hereto. 22 23 Date this 28th day of December 2020. 24 RADFORD J. SMITH, CHARTERED 25 /s/ Kimberly A. Stutzman 26 KIMBERLY A. STUTZMAN, ESQ. 27 Nevada Bar No. 014085 2470 St. Rose Parkway, Suite 206 28 Henderson, Nevada 89074

Electronically Filed 12/28/2020 9:34 AM

# **CERTIFICATE OF SERVICE**

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I hereby certify that I am an employee of Radford J. Smith, Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. Under the Firm's practice, mail is to be deposited with the U.S. Postal Service on the same day as stated below, with postage thereon fully prepaid.

I caused the foregoing document described as "NOTICE OF ENTRY OF FINDINGS OF FACT, CONCLUSIONS OF LAW, ORDER AND JUDGMENT FROM THE DECEMBER 3, 2020 EVIDENTIARY HEARING" to be served on this 28th day of December 2020, to all interested parties as follows:

BY MAIL: Pursuant to NRCP 5(b), I placed a true copy thereof enclosed in a sealed envelope addressed as follows;

I transmitted a copy of the foregoing BY ELECTRONIC SERVICE:  $\mathbb{X}$ document this date via the Eighth Judicial District Court's electronic filing system;

> Bart Mahoney 7960 Rafael Rivera Way, #300 Las Vegas, NV 89113 bmmlv27@gmail.com Plaintiff in Proper Person

/s/ Kimberly A. Stutzman

An Employee of Radford J. Smith, Chartered

# ELECTRONICALLY SERVED 12/24/2020 4:05 PM

Electronically Filed 12/24/2020 4:05 PM CLERK OF THE COURT

FFCL 1 RADFORD J. SMITH, CHARTERED KIMBERLY A. STUTZMAN, ESQ. Nevada Bar No. 014085 3 2470 St. Rose Parkway, Suite #206 Henderson, Nevada 89074 Telephone: (702) 990-6448 Facsimile: (702) 990-6456 rsmith@radfordsmith.com Attorneys for Defendant 8 DISTRICT COURT FAMILY DIVISION 9 CLARK COUNTY, NEVADA 10 CASE NO.: D-13-477883-D 11 BARTHOLOMEW M. MAHONEY, JR., DEPT NO.: S 12 Plaintiff, 13 vs. 14 BONNIE M. MAHONEY, 15 16 Defendant. 17 FINDINGS OF FACT, CONCLUSIONS OF LAW, ORDER AND JUDGMENT 18 19 DATE: December 3, 2020 20 TIME: 9:15 a.m. 21 This matter coming on for an Evidentiary Hearing; Plaintiff, BARTHOLOMEW M. 22 MAHONEY, JR. ("Bart"), not present and not represented; and Defendant, BONNIE M. 23 MAHONEY ("Bonnie"), present and represented by her attorney of record, Kimberly A. 24 25 Stutzman, Esq. of the law firm of Radford J. Smith, Chartered. The Court having heard the 26 testimony of witnesses sworn in open court, having reviewed the documentary evidence 27

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admitted at the Evidentiary Hearing, and having heard and considered the oral argument of counsel, and good cause appearing therefore, makes the following Findings of Fact, Conclusions of Law, and Orders.

I.

# FINDINGS OF FACT

- 1. THE COURT HEREBY FINDS that the Plaintiff, BARTHOLOMEW M. MAHONEY, ("Bart") was not present. The Court further finds that Bart was fully notified about the December 3, 2020 Evidentiary Hearing.
- 2. THE COURT FURTHER FINDS that the following findings of fact are based upon the testimony and documentary evidence heard and admitted at trial. To the extent any of the findings contain or reference legal conclusions, they should be considered, in part, Conclusions of Law.

# **Procedural History**

- 3. THE COURT FURTHER FINDS that the parties, Plaintiff, BARTHOLOMEW MAHONEY ("Bart"), age 54 and, Defendant, BONNIE MAHONEY ("Bonnie"), age 49, were divorced by stipulated Decree of Divorce ("Decree") filed February 3, 2016.
- 4. THE COURT FURTHER FINDS that the parties have two children, BRIGITTE MAHONEY ("Brigitte"), born October 29, 2001 (age 19), and SOPHIA MAHONEY ("Sophia"), born June 12, 2004 (age 16).

- 5. THE COURT FURTHER FINDS that Nevada has both personal and subject matter jurisdiction.
- 6. THE COURT FURTHER FINDS that Bonnie filed her Motion to Reduce Arrearages, Interest, and Penalties to Judgment; to Modify Alimony; to Review Child Support, for Sanctions and Attorney's Fees and Costs on May 9, 2019. She also filed her Schedule of Arrears on May 9, 2019.
- THE COURT FURTHER FINDS that Bart filed his Opposition on August 21,
   2019.
- 8. THE COURT FURTHER FINDS that the parties attended hearings on August 22, 2019 and November 13, 2019.
- 9. THE COURT FURTHER FINDS that the Evidentiary Hearing was scheduled for May 7, 2020 and then rescheduled for December 3, 2020.

#### Bonnie's Motion

- 10. THE COURT FURTHER FINDS that this is a post-decree action seeking enforcement of a Stipulated Decree of Divorce.
- 11. THE COURT FURTHER FINDS that on May 9, 2019, Bonnie filed her Motion for the following relief:
  - a. For an Order Reducing Bart's total amount of child and spousal support,
     attorney fees, and health insurance arrearages, including interest and penalties
     to judgment;

- b. For an Order sanctioning Bart pursuant to EDCR 7.60 for his failure to abide by the Court's Orders;
- c. For a review and modification of Child Support;
- d. For a review, modification, and extension of Alimony; and,
- e. For an Order directing Defendant to pay Bonnie's reasonable attorney fees and costs.
- 12. THE COURT FURTHER FINDS that in her Motion, Bonnie asserted that Bart violated the terms of the Decree by failing to make full payments due to Bonnie or by failing to make payments timely. Bonnie sought a judgment for arrearages, penalties, interest, sanctions and attorney's fees.
- hearing and provided her Updated Schedules of Arrearages as evidence of Bart's arrearages in the payments due under the Decree. She provided a calculation of the interest and penalties due as a result of Bart's missing or untimely payments. *See* Defendant's Exhibit "C." The Court finds Bonnie's testimony credible. Bart was not present and failed to provide evidence of payment, timely payment, or to rebut Bonnie's assertions contained in her testimony and Updated Schedules of Arrearages.
- 14. The evidence at the Evidentiary Hearing demonstrated that Bart did not timely pay child support, spousal support, attorney's fees, and bonus payments to Bonnie. Bart's late or non-payments caused him to be subject to the 10% penalty for non-payment of

support (until NAC 425 was enacted on February 1, 2020), and that those penalties were calculated as part of Bonnie's Updated Schedule of Arrearages. The Court reviewed Bonnie's Updated Schedule of Arrears and agrees with her calculation in Exhibit "C" due from Bart to Bonnie.

# Non-Payment of Child Support and Spousal Support

- 15. THE COURT FURTHER FINDS that Bart is ordered to pay Bonnie child support in the amount of \$1,091 per child per month, for a total of \$2,182 per month. See Decree of Divorce, page 5, line 8. One-half of the total amount of child support is due on the 5<sup>th</sup> of each month, and the remaining half is due by the 25<sup>th</sup> of each month. See Decree, page 5, line 10.
- 16. THE COURT FURTHER FINDS that Bart is ordered to pay Bonnie spousal support in the amount of \$2,668 per month for four (4) years beginning September 1, 2015. See Decree, page 6, line 26. One-half of the total amount of child support is due on the 5<sup>th</sup> of each month, and the remaining half is due by the 25<sup>th</sup> of each month. See Decree, beginning page 6, line 28.
- 17. THE COURT FURTHER FINDS that Bart failed to timely or fully pay his obligations to Bonnie. Rather than pay the total amount due prior to the 5<sup>th</sup> and 25<sup>th</sup> of each month, Bart pays Bonnie sporadically each month.
- 18. THE COURT FURTHER FINDS that Bonnie filed an Updated Schedule of Arrears on November 30, 2020. Bonnie offered her Updated Schedule of Arrears at trial as

her Exhibit "C," which was admitted. See Defendant's Trial Exhibit "C," attached hereto. Then, Bonnie corrected the Schedule of Arrears regarding Child Support and Spousal Support on the record at the December 3, 2020 hearing. Thereafter, Bonnie submitted an Amended Exhibit A regarding child support and family support to her Trial Exhibit "C," attached hereto.

- 19. THE COURT FURTHER FINDS that Bart paid Bonnie support from his JP Morgan Chase, Wells Fargo, and First Republic Bank accounts.
- 20. THE COURT FURTHER FINDS that Bonnie subpoenaed Bart's JP Morgan Chase, Wells Fargo, and First Republic Bank accounts. Bonnie offered and the court admitted these subpoenas at trial, which were Defendant's Exhibits E, F, and G.
- Arrears and the subpoena responses, Bart owes Bonnie unpaid child support and spousal support in the amount of \$28,384.02. Bart also owes Interest in the amount of \$3,425.67. Bart owes Penalties through to February 1, 2020 pursuant to NAC 425 in the amount of \$3,399.71. Thus, the Court FINDS that Bart owes Bonnie a \$35,209.40 through December 2020 for the non-payment of child support and spousal support.

# Non-Payment of Attorney's Fees

22. THE COURT FURTHER FINDS that under the terms of the Stipulated Decree, Bart was ordered to reimburse Bonnie attorney fees in the amount of \$10,000. Bart was to

pay Bonnie \$555 per month for the attorney fees directly until paid in full. See Decree, page 7, line 10.

- 23. THE COURT FURTHER FINDS that Bart failed to make full or timely payments to Bonnie as and for the attorney's fees owed to her pursuant to the Decree.
- 24. THE COURT FURTHER FINDS that pursuant to the Updated Schedule of Arrears, Exhibit "C," Bart paid Bonnie \$4,895.00 and owes Bonnie \$5,105.00, which accrued interest in the amount of \$1,523.78. Thus, Bart owes Bonnie \$6,628.78 through December 2020.

# Non-Payment of Bonus Portions

25. THE COURT FURTHER FINDS that under the terms of the Stipulated Decree, Bart is ordered to pay Bonnie a portion of his bonuses each year. The Decree states in relevant part –

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Dad receives bonuses annually and it is agreed that Dad shall pay Mom twenty-five percent (25%) of the after-tax amount of the bonus for a period of four years, commencing September 1, 2015. For tracking purposes, Dad shall provide Mom with a copy of his W-2 forms annually. If Dad does not provide his W-2 forms to Mom by April 15th of each year, Dad shall be responsible to pay Mom thirty-five (35%) of the after-tax amount of any bonus he received for the period in which he failed to provide the W-2.

See Decree of Divorce, page 5, lines 15-21. The court reserved jurisdiction for the purposes of addressing the bonuses. See Decree, page 7, lines 26-28.

26. THE COURT FURTHER FINDS that Bart failed to timely pay Bonnie her share of the bonuses.

- 27. THE COURT FURTHER FINDS that Bart failed to provide Bonnie with evidence of his bonus(es) each year by April 15<sup>th</sup>. Bart failed to provide Bonnie with his W2 forms or any portion of the after-tax amount for 2015, 2016, 2017, and 2018 despite Bonnie's requests.
- 28. THE COURT FURTHER FINDS that because Bart failed to comply with the April 15<sup>th</sup> deadline each year, Bart must pay Bonnie 35% of the after-tax bonuses plus the legal interest that accrued as a result of his non-payment.
- 29. THE COURT FURTHER FINDS that Bonnie subpoenaed Bart's employers: Southern Glazier Wine and Spirits, Shamus & Peabody LLC, Thomas Keller Restaurant Group, Resorts World Las Vegas, Golden Entertainment, and Wynn Las Vegas. Bonnie offered and the court admitted these subpoenas which were Defendant's Exhibits H, I, J, and GG.
- 30. THE COURT FURTHER FINDS that pursuant to the Updated Schedule of Arrears, Exhibit "C," Bart received the following bonuses, none of which he provided information before April of each of the following year to Bonnie:

TI' I Coinite	2015	5/15/2015	\$	28,764.00	DEF1511
Southern Wine and Spirits		5/22/2015	\$	58,554.08	DEF1047
Southern Wine and Spirits	2015		Φ	10,000.00	DEF1053
Bonus Deposited in acct	2015	6/4/2015	Φ_		DEF1461
Shamus & Peabody LLC	2015	9/1/2015	\$_	15,000.00	
Shamus & Peabody LLC	2016	2/15/2016	\$	2,105.98	DEF1465
Sharras co r cascary					

Thomas Keller Restaurant Group	2016	7/22/2016	\$_	4,646.45	DEF1468
Wynn Las Vegas	2017	1/8/2017	\$	40,000.00	DEF2176
Wynn Las Vegas	2018	1/19/2018	\$	40,000.00	DEF2174
Golden Entertainment - signing bonus	2018	6/8/2018	\$	25,000.00	DEF1863
Resorts World	2019	1/9/2020	\$	80,384.49	DEF1756
Resorts World	2019	6/6/2019	\$	25,000.00	DEF1724

31. THE COURT FURTHER FINDS that because Bart failed to provide the information, Bonnie is entitled to receive 35% of the bonuses listed above. The 35% of each bonus is calculated in Bonnie's Exhibit "C" as follows:

\$ 10,067.40
\$ 20,493.93
\$ 3,500.00
\$ 5,250.00
\$ 737.09
\$ 1,626.26
\$ 14,000.00
\$ 14,000.00
\$ 8,750.00
\$ 28,134.57
\$ 8,750.00
\$ \$ \$ \$ \$ \$ \$ \$

See Defendant's Exhibit "C."

32. THE COURT FURTHER FINDS that because Bart failed to pay Bonnie her portion of the bonuses, interest accrued on the amounts listed above. See Defendant's Exhibit "C." The total, including interest owed on the amounts due to Bonnie are calculated in Bonnie's Exhibit "C" as follows:

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Southern Wine and Spirits	\$ 13,062.45
Southern Wine and Spirits	\$ 26,590.87
Bonus Deposited in acct	\$ 4,541.25
Shamus & Peabody LLC	\$ 6,811.88
Shamus & Peabody LLC	\$ 915.39
Thomas Keller Restaurant Group	\$ 2,019.61
Wynn Las Vegas	\$ 16,520.00
Wynn Las Vegas	\$ 16,520.00
Golden Entertainment - signing bonus	\$ 9,712.50
Resorts World	\$ 29,347.87
Resorts World	\$ 9,127.34

33. THE COURT FURTHER FINDS that the total bonus monies, without interest, owed to Bonnie is \$115,309.25. Because Bart failed to pay, interest accrued, and the total bonus money plus interest owed to Bonnie is \$135,169.16.

# Modification of Child Support

- 34. THE COURT FURTHER FINDS that Bonnie moved to modify child support in her motion filed on May 9, 2019. Bart filed his Opposition on August 21, 2019, but he did not oppose the modification of child support. Bart, however, did not file a Motion to Modify Child Support at any time.
- 35. THE COURT FURTHER FINDS that because Bonnie filed her Motion on May 9, 2019, the modified child support would be retroactively applied to begin on June 1, 2019.
- 36. THE COURT FURTHER FINDS that Bart filed a Financial Disclosure Form on December 13, 2019, which was offered and admitted as Defendant's Exhibit "B." Bart indicated that his Gross Monthly Income was \$22,916.40. Bart indicated that he works at

Resorts World Las Vegas and earns \$132.21 per hour. Bart did not file an updated Financial Disclosure Form since December 13, 2019.

- 37. THE COURT FURTHER FINDS that on October 1, 2019, Brigitte turned 18. Brigitte did not graduate until August 2020. Thus, her child support should have continued until graduation, and the current court ordered child support remained \$2,182 until that time. Bart, however, unilaterally decided to reduce his child support obligation from \$2,182 to \$1,091 per month without a court order allowing him to do so. Bonnie's Updated Schedule of Arrears outlines Bart's partial payments.
  - 38. THE COURT FURTHER FINDS that Bart's child support for two children is \$2,534.98 per month calculated as follows:

3.5 (1)	Amount	Percent	Ch	ild Support	
Month			\$6,000.00	\$	1,320.00
\$22,916.40	\$0-\$6,000	22%	\$0,000.00		
<b>VII</b>	\$6,001-\$10,000	11%	4,000.00	\$	440.00
	\$10,000-No Limit		\$12,916.40	\$	774.98 <b>2,534.9</b> 8
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- 39. THE COURT FURTHER FINDS that the parties' oldest daughter, Brigitte turned 18 on October 29, 2019, but she did not graduate high school until August 2020.
- 40. THE COURT FURTHER FINDS that, as a result, the modification for child support for two children as calculated above shall be retroactive to June 1, 2019.

 41. THE COURT FURTHER FINDS that beginning September 1, 2020, child support shall be modified to \$1,796.66 for one minor child as a result of Brigitte's graduation from high school and emancipation, calculated as follows:

Month	Amount	Percent		Child Support	
\$22,916.40	\$0- \$6,000	16%	\$6,000.00	\$	960
	\$6,001-\$10,000	8%	\$4,000.00	\$	320
	\$10,001-No				
	Limit	4%	\$12,916.40	\$	516.66
				\$	1,796.66

# Unreimbursed Orthodontic Expenses

- 42. THE COURT FURTHER FINDS that the parties' Decree states that the parties shall divide unreimbursed medical expenses according to the Court's 30/30 rule, which requires the party who incurs an unreimbursed expense to send a written request for reimbursement of one-half of the expense within thirty days of incurring the expense. See Decree of Divorce, page 2, paragraph 8. Upon receipt, the other parent must then reimburse the incurring parent one-half within thirty days. Then, if the requested reimbursement is not timely submitted, such failure may be considered a Contempt of Court. Id.
- 43. THE COURT FURTHER FINDS that Bonnie incurred expenses as a result of Brigitte's orthodontic work for her braces. *See* Defendant's Exhibit "R" and "Z," which were offered and admitted at trial. As a result, Bart owes Bonnie for the unpaid, unreimbursed orthodontics expenses in the amount of \$3,200.

44. THE COURT FURTHER FINDS that Bonnie is entitled to an award of Attorney's Fees and Costs as a result of prosecuting her Motion and preparing for the Evidentiary Hearing.

#### II.

#### **CONCLUSIONS OF LAW**

- 45. THE COURT FURTHER FINDS that when parties to pending litigation enter into a settlement, they enter into a contract. Such a contract is subject to general principles of contract law. *Grisham v. Grisham*, 289 P.3d 230, 234 (Nev. 2012) (citations omitted).
- 46. THE COURT FURTHER FINDS that the parties entered into a settlement agreement. Thus, the Decree is subject to general principles of contract law.
  - 47. THE COURT FURTHER FINDS that EDCR 5.508 states in relevant part:

A motion alleging the existence of arrears in payment of periodic child support, spousal support, or other periodic payment shall be accompanied by a separately filed schedule showing the date and amount of each payment due, and the date and amount of any payments received.

Bonnie's Schedule of Arrearages sets forth the interest and penalties that accrued on Bart's support obligations.

- 48. THE COURT FURTHER FINDS that the court may enter an order reducing any support arrearages to judgment. NRS 125.180 states as follows
  - 1. When either party to an action for divorce, makes default in paying any sum of money as required by the judgment or order directing the payment thereof, the district court may make an order directing entry of judgment for

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the amount of such arrears, together with costs and a reasonable attorney's fee.

2. The application for such order shall be upon such notice to the defaulting

party as the court may direct.

3. The judgment may be enforced by execution or in any other manner provided by law for the collection of money judgments.

4. The relief herein provided for is in addition to any other remedy provided by law.

# [Emphasis added.]

- The court may also award interest on the child support arrearages owed. NRS 49. 125B.140 states in relevant part -
  - 1. Except as otherwise provided in chapter 130 of NRS and NRS 125B.012: (a) If an order issued by a court provides for payment for the support of a child, that order is a judgment by operation of law on or after the date a payment is due. Such a judgment may not be retroactively modified or adjusted and may be enforced in the same manner as other judgments of this state.
    - 2. Except as otherwise provided in subsection 3 and NRS 125B.012, 125B.142 and 125B.144:
      - (c) The court shall determine and include in its order:
        - (1) Interest upon the arrearages at a rate established pursuant to NRS 99.040, from the time each amount became due; and
      - (2) A reasonable attorney's fee for the proceeding, unless the court finds that the responsible parent would experience an undue hardship if required to pay such amounts. Interest continues to accrue on the amount ordered until it is paid, and additional attorney's fees must be allowed if required for collection.
  - [Emphasis added.] Further, the Court must accrue a penalty of 10% per annum on all arrearages past thirty (30) days delinquent pursuant to NRS 125B,095 until February 1, 2020 when NAC 425 became effective. See Updated Schedule of Arrears.

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THE COURT FURTHER FINDS that Bart failed to pay Bonnie child support, 50. spousal support, bonuses, orthodontic expenses, and attorney fees due under the Court's Decree. See Updated Schedule of Arrearages.

THE COURT FURTHER FINDS that all amounts due accrue legal interest 51. from the date of the filing of this motion. NRS 17.115 states:

When no rate of interest is provided by contract or otherwise by law, or specified in the judgment, the judgment draws interest from the time of service of the summons and complaint until satisfied, except for any amount representing future damages, which draws interest only from the time of the entry of the judgment until satisfied, at a rate equal to the prime rate at the largest bank in Nevada as ascertained by the commissioner of financial institutions on January 1 or July 1, as the case may be, immediately preceding the date of judgment, plus 2 percent. The rate must be adjusted accordingly on each January 1 and July 1 thereafter until the judgment is satisfied.

THE COURT FURTHER FINDS that NRS 99.040 accounts for the interest 52. rate when it is not fixed by express contract for certain types of transactions. That statute reads:

- 1. When there is no express contract in writing fixing a different rate of interest, interest must be allowed at a rate equal to the prime rate at the largest bank in Nevada, as ascertained by the Commissioner of Financial Institutions, on January 1 or July 1, as the case may be, immediately preceding the date of the transaction, plus 2 percent, upon all money from the time it becomes due, in the following cases:
- (a) Upon contracts, express or implied, other than book accounts.
- (b) Upon the settlement of book or store accounts from the day on which the balance is ascertained.
- (c) Upon money received to the use and benefit of another and detained without his or her consent.
- (d) Upon wages or salary, if it is unpaid when due, after demand therefore

has been made.

The rate must be adjusted accordingly on each January 1 and July 1 thereafter until the judgment is satisfied.

- 53. THE COURT FURTHER FINDS that the parties did not expressly fix an interest rate. The legal interest rate applies to Bart's nonpayment.
  - 54. THE COURT FURTHER FINDS that EDCR 7.60(b) states in pertinent part:
  - (b) The court may, after notice and an opportunity to be heard, impose upon an attorney or a party any and all sanctions which may, under the facts of the case, be reasonable, including the imposition of fines, costs or attorney's fees when an attorney or a party without just cause:
  - (3) So multiplies the proceedings in a case as to increase costs unreasonably and vexatiously.
  - (5) Fails or refuses to comply with any order of a judge of the court.
- 55. THE COURT FURTHER FINDS that Bart's failures to pay are willful. Bart is a successful businessman. Upon information and belief Bart continues to receive a significant salary including yearly bonuses. There is no legitimate excuse for Bart's nonpayment. He continues to live the same lifestyle he lived during the parties' marriage. He continues to reside in a nice home, purchase discretionary items, take vacations, etc.
- 56. THE COURT FURTHER FINDS that as a result of Bart's noncompliance, he unnecessarily multiplied the proceedings in this matter by failing to comply with the Court's orders. Bonnie attempted to minimize the fees related to this matter by giving Bart more than ample opportunity to comply with these orders and by postponing the filing of her Motion in May 2019.

- 57. THE COURT FURTHER FINDS that Bart failed to appear at the Evidentiary Hearing and failed provide any evidence to support his claims in his opposition.
- 58. THE COURT FURTHER FINDS that Bonnie seeks a judgment against Bart for the fees and costs she expended in filing her Motion, preparing for the evidentiary hearing, and in attempting to seek Bart's compliance with the parties' Stipulated Decree of Divorce. Bonnie seeks judgment against Bart for the full amount of fees and costs she has incurred. A memorandum of fees and costs incurred by Bonnie will be filed.
  - 59. THE COURT FURTHER FINDS that NRS 125B.145(1) reads:
  - 1. An order for the support of a child must, upon the filing of a request for review by:
    - (a) The Division of Welfare and Supportive Services of the Department of Health and Human Services, its designated representative or the district attorney, if the Division of Welfare and Supportive Services or the district attorney has jurisdiction in the case; or
  - (b) A parent or legal guardian of the child, be reviewed by the court at least every 3 years pursuant to this section to determine whether the order should be modified or adjusted. Each review conducted pursuant to this section must be in response to a separate request.
  - 60. THE COURT FURTHER FINDS that the last order regarding child support was filed on February 3, 2016, more than three years ago. For those reasons, this Court properly reviewed and modified the child support award.
  - 61. THE COURT FURTHER FINDS that Bart's FDF filed December 13, 2019 indicates that he earns \$132.21 per hour, which is \$274,996.80 per year or a gross monthly income of \$22,916.40.

62. THE COURT FURTHER FINDS that this amount should be applied retroactively to June 1, 2019 pursuant to NAC 425.160 which states in relevant part:

# NAC 425.160 Termination or modification of order when child reaches certain age.

- 3. If an order pertains to more than one child and does not allocate a specific amount of the total child support obligation to each child:
  - (a) If a party wishes to modify the order when a child reaches 18 years of age or, if the child is still in high school, graduates from high school or reaches 19 years of age, whichever comes first, the party must file a motion to modify the order with the court or submit a stipulation between the parties to the court.
  - (b) If a motion to modify the order is filed with the court, any modification of the child support obligation:
  - (1) Must be in compliance with the child support guidelines in existence at the time of the modification for the remaining children to whom the order pertains; and
  - (2) Unless the parties agree otherwise in a stipulation, will be effective as of the date the motion to modify the order was filed with the court.

Furthermore, though Bonnie's motion was filed May 9, 2019, prior to the enactment of NAC 425, the formula used to calculate the child support must be NAC 425 because it is the guideline in existence as of the date of the Evidentiary Hearing on December 3, 2020.

63. THE COURT FURTHER FINDS that pursuant to NAC 425, his child support should be calculated as follows for two children:

$$6,000 \times 22\% = 1,320$$

$$+ $4,000 \times 11\% = $440$$

$$+$$
 \$12,916.40 x 6% = \$774.98

64. THE COURT FURTHER FINDS that pursuant to NAC 425, his child support should be calculated as follows for one child:

$$6,000 \times 16\% = 960$$

$$+ $4,000 \times 8\% = $320$$

- = **\$1,797**
- 65. THE COURT FURTHER FINDS that Bart multiplied these proceedings and as a result, Bonnie incurred attorney's fees and costs in the prosecution of this action.
- 66. THE COURT FURTHER FINDS that a request for an order directing another party to pay attorney's fees must be based upon statute, rule or contractual provision. See, e.g, Rowland v. Lepire, 99 Nev. 308, 662 P.2d 1332 (1983).
- 67. THE COURT FURTHER FINDS that there is a statutory mandate for an award of fees against a party shown to be in arrearages in child support (NRS 125B.140).
- 68. THE COURT FURTHER FINDS that the Eighth Judicial District Rules are also a basis for an award of fees and a fine (a penalty above the amount of reasonable attorneys and costs) based upon Bart's breach of the parties' Stipulated Decree.
- 69. THE COURT FURTHER FINDS that as stated above, EDCR 7.60 allows an order for attorney's fees when a party multiplies the proceedings or "Fails or refuses to comply with any order of a judge of the court." EDCR 7.60(b)(5).

70. THE COURT FURTHER FINDS that Bart failed to comply with the Decree requirement that he pay child support, alimony, attorney fees, bonuses, and 30/30 health insurance expenses to Bonnie. Bonnie attempted to resolve these issues with Bart to no avail.

- 71. THE COURT FURTHER FINDS that NRS 125.150 pertaining to an award for attorney's fees, states in relevant part,
  - 3. Except as otherwise provided in NRS 125.141, whether or not application for suit money has been made under the provisions of NRS 125.040, the court may award a *reasonable attorney's fee* to either party to an action for divorce if those fees are in issue under the pleadings.

[Emphasis added]

72. THE COURT FURTHER FINDS that in *Miller v. Wilfong*, 121 Nev. 619, 621, 119 P.3d 727, 730 (2005), the Court stated:

[I]t is within the trial court's discretion to determine the reasonable amount of attorney fees under a statute or rule, in exercising that discretion, the court must evaluate the factors set forth in *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969). Under *Brunzell*, when courts determine the appropriate fee to award in civil cases, they must consider various factors, including the qualities of the advocate, the character and difficulty of the work performed, the work actually performed by the attorney, and the result obtained. We take this opportunity to clarify our jurisprudence in family law cases to require trial courts to evaluate the *Brunzell* factors when deciding attorney fee awards. Additionally, in *Wright v. Osburn*, this court stated that family law trial courts must also consider the disparity in income of the parties when awarding fees. Therefore, parties seeking attorney fees in family law cases must support their fee request with affidavits or other evidence that meets the factors in *Brunzell* and *Wright*.

- 73. THE COURT FURTHER FINDS that one of the four factors this Court must review, under the above cited decisions in *Wilfong* and *Brunzell*, is the result obtained. NRCP 54 states in relevant part,
  - (B) Timing and Contents of the Motion. Unless a statute provides otherwise, the motion must be filed no later than 20 days after notice of entry of judgment is served; specify the judgment and the statute, rule, or other grounds entitling the movant to the award; state the amount sought or provide a fair estimate of it; and be supported by counsel's affidavit swearing that the fees were actually and necessarily incurred and were reasonable, documentation concerning the amount of fees claimed, and points and authorities addressing appropriate factors to be considered by the court in deciding the motion. The time for filing the motion may not be extended by the court after it has expired.

#### III.

# <u>ORDER</u>

NOW, THEREFORE, based on the foregoing findings and the parties' stipulations, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

- 1. THE COURT HEREBY ORDERS that Bonnie's Motion shall be GRANTED as addressed and ordered herein.
- 2. THE COURT FURTHER ORDERS that the unpaid child support and spousal support in the amount of \$35,209.40 shall be REDUCED TO JUDGMENT and collectible by all legal means.

- 3. THE COURT FURTHER ORDERS that the unpaid attorney's fees in the amount of \$6,628.00 shall be REDUCED TO JUDGMENT and collectible by all legal means.
- 4. THE COURT FURTHER ORDERS that the unpaid bonuses due to Bonnie in the amount of \$135,169.16 shall be REDUCED TO JUDGMENT and collectible by all legal means.
- 5. THE COURT FURTHER ORDERS that the unpaid, unreimbursed orthodontic expenses for Brigitte in the amount of \$3,200.00 shall be REDUCED TO JUDGMENT and collectible by all legal means.
- 6. THE COURT FURTHER ORDERS that a WAGE ASSIGNMENT shall be issued to collect all child support and child support arrearages beginning June 1, 2019.
- 7. THE COURT FURTHER ORDERS that child support shall be modified and retroactive to June 1, 2019 as indicated below.
- 8. THE COURT FURTHER ORDERS that child support for two children from June 1, 2019 through to August 1, 2020 shall be modified to \$2,534.98 per month from Bart to Bonnie.
- 9. THE COURT FURTHER ORDERS that child support for one child from September 1, 2020 through to present shall be modified to \$1,796.00 per month from Bart to Bonnie.

attorney's fees and costs for preparation of the December 3, 2020 Evidentiary Hearing. Thus, Bonnie's Motion for Attorney's Fees is GRANTED. She shall submit a Memorandum of Fees and Costs within two weeks from the Notice of Entry of Order with the exact amount of fees incurred along with a *Brunzell* Affidavit.

Dated this 24th day of December, 2020

Limit Ochor

78A 684 6844 9045 Vincent Ochoa District Court Judge

Respectfully submitted by:

RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman

KIMBERLY A. STUTZMAN, ESQ.

Nevada Bar No. 014085

2470 St. Rose Parkway, Suite 206

Henderson, Nevada 89074

(702) 990-6448

Attorneys for Defendant

# DEFENDANT'S TRIAL EXHIBIT "C"

WITH AMENDED EXHIBIT "A" – FOR CHILD SUPPOR AND SPOUSAL SUPPORT

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Steven D. Grierson
CLERK OF THE COURT

1 **SCHD** RADFORD J. SMITH, CHARTERED 2 KIMBERLY A. STUTZMAN, ESQ. Nevada State Bar No. 014085 3 2470 St. Rose Parkway Suite 206 Henderson, Nevada 89014 Telephone: (702) 990-6448 5 Facsimile: (702) 990-6456 6 kmedina@radfordsmith.com Attorneys for Defendant 8 DISTRICT COURT 9 CLARK COUNTY, NEVADA 10 CASE NO.: D-13-477883-D 11 BARTHOLOMEW M. MAHONEY, JR., DEPT NO.: S 12 Plaintiff, 13 FAMILY DIVISION VS. 14 BONNIE M. MAHONEY, 15 16 Defendant. 17 UPDATED SCHEDULE OF ARREARAGES 18 DATE OF HEARING: November 13, 2019 19 TIME OF HEARING: 9:15 a.m. 20 21 STATE OF NEVADA 22 ) ss. COUNTY OF CLARK 23 KIMBERLY STUTZMAN, ESQ., declares and says: 24 25 I am the Attorney for the Defendant in the above-entitled matter. 1. 26 27 28

- 2. Defendant, BONNIE MAHONEY is owed and entitled to receive certain periodic monthly payments from Plaintiff, BARTHOLOMEW M. MAHONEY, JR. ("Bart") pursuant to the stipulated Decree of Divorce ("Decree") filed on February 3, 2016.
- BARTHOLOMEW M. MAHONEY, JR. failed to make complete and full payments when due.
- 4. The Updated Schedule of Arrears for Child Support, Spousal Support, Attorney Fees, and Bonuses is attached hereto as Exhibit "A" is a true and accurate statement of all payment due dates and payments received during the months noted along with the interest and penalties.
- 5. Bart owes in combined support arrears of \$25,741.00. Interest and penalties (through January 31, 2020 pursuant to NAC 425) accrued. Bart owes \$3,703.06 in interest and \$4,042.32 in penalties. Thus, Bart owes unpaid support in the amount of \$33,486.38.
- 6. Bart is also in arrears for attorney fees and costs in the amount of \$5,105.00. Interest also accrued in the amount of \$1,523.78. Bart owes a total for unpaid attorney's fees in the amount of \$6,628.78.

[This space intentionally left blank.]

7. Bart received the following bonuses, none of which he provided information before April of each of the following year to Bonnie:

Southern Wine and Spirits	2015	5/15/2015	\$ 28,764.00	DEF1511
Southern Wine and Spirits	2015	5/22/2015	\$ 58,554.08	DEF1047
Bonus Deposited in acct	2015	6/4/2015	\$ 10,000.00	DEF1053
Shamus & Peabody LLC	2015	9/1/2015	\$ 15,000.00	DEF1461
Shamus & Peabody LLC	2016	2/15/2016	\$ 2,105.98	DEF1465
Thomas Keller Restaurant				
Group	2016	7/22/2016	\$ 4,646.45	DEF1468
Wynn Las Vegas	2017	1/8/2017	\$ 40,000.00	DEF2176
Wynn Las Vegas	2018	1/19/2018	\$ 40,000.00	DEF2174
*Golden 2018 - Bonus eligibility 30% base pay				DEF1842
Golden Entertainment -				
signing bonus	2018	6/8/2018	\$ 25,000.00	DEF1863
Resorts World	2019	1/9/2020	\$ 80,384.49	DEF1756
Resorts World	2019	6/6/2019	\$ 25,000.00	DEF1724

8. Because Bart failed to provide the information, Bonnie is entitled to receive 35% of the bonus as follows:

Southern Wine and Spirits	\$ 10,067.40
Southern Wine and Spirits	\$ 20,493.93
Bonus Deposited in acct	\$ 3,500.00
Shamus & Peabody LLC	\$ 5,250.00
Shamus & Peabody LLC	\$ 737.09
Thomas Keller Restaurant Group	\$ 1,626.26
Wynn Las Vegas	\$ 14,000.00
Wynn Las Vegas	\$ 14,000.00
*Golden 2018 - Bonus eligibility 30% base	
pay	\$ ) <u>-</u>
Golden Entertainment - signing bonus	\$ 8,750.00
Resorts World	\$ 28,134.57
Resorts World	\$ 8,750.00

9. Furthermore, because Bart has not paid, interest accrued. The total amount, including interest on the amounts due to Bonnie are as follows:

Southern Wine and Spirits	\$ 13,062.45
Southern Wine and Spirits	\$ 26,590.87
Bonus Deposited in acct	\$ 4,541.25
Shamus & Peabody LLC	\$ 6,811.88
Shamus & Peabody LLC	\$ 915.39
Thomas Keller Restaurant Group	\$ 2,019.61
Wynn Las Vegas	\$ 16,520.00
Wynn Las Vegas	\$ 16,520.00
*Golden 2018 - Bonus eligibility 30% base	-
pay	
Golden Entertainment - signing bonus	\$ 9,712.50
Resorts World	\$ 29,347.87
Resorts World	\$ 9,127.34

- 10. The total bonus monies owed to Bonnie including interest is \$135,169.16.
- 11. Thus, the combined support arrears, attorney fees, and bonus arrears of \$175,284.32. That amount should be reduced to judgment collectable by any and all legal means.
- 12. Under penalty of perjury, pursuant to the best information known and available to me, the following schedule accurately sets out the dates and amounts of periodic payments due pursuant to a lawful court order, the dates and amounts of all payments received, and the principal, interest, and penalties due.

I declare under penalty of perjury, under the laws of the State of Nevada and the United States (NRS 53.045 and 28 U.S.C. § 1746), that the foregoing is true and

RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman KIMBERLY A. STUTZMAN, ESQ. Nevada State Bar No. 014085 2470 St. Rose Parkway Suite 206 Henderson, Nevada 89014 Telephone: (702) 990-6448 Facsimile: (702) 990-6456

Attorneys for Defendant

## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Radford J. Smith, Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. Under the Firm's practice, mail is to be deposited with the U.S. Postal Service on the same day as stated below, with postage thereon fully prepaid.

I served the foregoing documents described as **UPDATED SCHEDULE OF** 

ARREARS on this 30th day of November 2020, to all interested parties

BY ELECTRONIC MAIL: Pursuant to Admin Order 20-17:

Bart Mahoney bmmlv27@gmail.com

/s/ Kimberly A. Stutzman

An employee of Radford J. Smith, Chartered

## EXHIBIT "A"

AA000421

Proceeding	Annual L. Annual						
Automati Date   Propriett	Amount Due         Payment         Monthly Arrearing         Interest Broken           \$ 4,850.00         \$ 4,850.00         \$ 6,088.00         \$ 5.25           \$ 4,850.00         \$ 4,850.00         \$ 6,088.00         \$ 5.25           \$ 4,850.00         \$ 4,850.00         \$ 2,807.39         \$ 5.26           \$ 4,850.00         \$ 4,850.00         \$ 2,807.59         \$ 5.60.00           \$ 4,850.00         \$ 4,850.00         \$ 4,350.00         \$ 5.56           \$ 4,850.00         \$ 4,850.00         \$ 4,300.00         \$ 5.56           \$ 4,850.00         \$ 4,850.00         \$ 4,300.00         \$ 5.56           \$ 4,850.00         \$ 4,850.00         \$ 4,300.00         \$ 5.56           \$ 4,850.00         \$ 4,850.00         \$ 5,320.00         \$ 5.50.00           \$ 4,850.00         \$ 3,220.00         \$ 1,630.00         \$ 5.56           \$ 4,850.00         \$ 3,220.00         \$ 1,630.00         \$ 5.56           \$ 4,850.00         \$ 3,220.00         \$ 1,630.00         \$ 5.56           \$ 4,850.00         \$ 3,220.00         \$ 1,630.00         \$ 5.56           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,260.00           \$ 4,850.00         \$ 4,850.00         \$ 5,200.00         \$ 5,200.00<		A Managar	Monthly Interest	Monthly Penalty Rate as Factor (10%	Monthly Penalty	Ě
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S         4,850,00         S         4,350,00         S         4,350,00         S         6,144,00         S         6,144,00         S         6,144,00         S         6,144,00         S         6,144,00         S         7,14         0,008333         S           S         4,850,00         S         3,500,00         S         1,250,00         S         1,004,58         S         6,544,00         S         7,14         0,008333         S           S         4,850,00         S         3,400,00         S         1,150,00         S         0,00438         S         8,104,00         S         7,14         0,008333         S           S         4,850,00         S         1,150,00         S         5,00         0,00438         S         9,814,00         S         7,14         0,008333         S           S         4,850,00         S         1,150,00         S         5,00         0,00438         S         9,814,00         S         44,350         0,008333         S           S         4,850,00         S         1,150,00         S         5,00         0,00438         S         9,814,00         S         41,38         0,008333         S	\$ 4,850.00         \$ 5,000         \$ 5,000         \$ 5,000           \$ 4,850.00         \$ 3,600.00         \$ 1,150.00         \$ 5,500           \$ 4,850.00         \$ 3,600.00         \$ 1,150.00         \$ 5,500           \$ 4,850.00         \$ 3,700.00         \$ 1,150.00         \$ 5,500           \$ 4,850.00         \$ 3,700.00         \$ 1,630.00         \$ 5,500           \$ 4,850.00         \$ 4,350.00         \$ 4,850.00         \$ 5,520.00         \$ 5,520.00           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,520.00 <t< td=""><td>0.00450</td><td></td><td></td><td><math>\perp</math></td><td></td><td>47.53</td></t<>	0.00450			$\perp$		47.53
\$ 4,850.00         \$ 1,200.00         \$ 1,200.00         \$ 2,00         \$ 1,200.00         \$ 2,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 2,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00         \$ 1,200.00<	\$ 4,850.00 \$ 4,350.00 \$ 5.50.00 \$ 5.50   \$ 4,850.00 \$ 3,700.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 3,700.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 3,700.00 \$ 1,630.00 \$ 5.5   \$ 4,850.00 \$ 4,850.00 \$ 1,630.00 \$ 5.5   \$ 4,850.00 \$ 4,850.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 5,320.00 \$ 1,600.00 \$ 5.5   \$ 4,850.00 \$ 6,450.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 5,260.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 5,260.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 5,400.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 5,400.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 5,400.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 6,400.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 6,400.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 6,400.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 6,400.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 6,400.00 \$ 1,150.00 \$ 5.5   \$ 4,850.00 \$ 1,100.00	0.00438		64			50 65
8         4,850,00         S         4,250,00         S         1,250,00         S         1,250,00         S         1,250,00         S         1,250,00         S         1,150,00         S         1,150,00 <t< td=""><td>\$ 4,850.00         \$ 3,500.00         \$ 1,250.00         \$ 5.5           \$ 4,850.00         \$ 3,700.00         \$ 1,150.00         \$ 5.5           \$ 4,850.00         \$ 3,700.00         \$ 1,150.00         \$ 5.5           \$ 4,850.00         \$ 3,700.00         \$ 1,150.00         \$ 5.5           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,320.00         \$ 5.5           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,320.00         \$ 5.5           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,200</td><td></td><td></td><td>5</td><td>   </td><td>۱</td><td>67.52</td></t<>	\$ 4,850.00         \$ 3,500.00         \$ 1,250.00         \$ 5.5           \$ 4,850.00         \$ 3,700.00         \$ 1,150.00         \$ 5.5           \$ 4,850.00         \$ 3,700.00         \$ 1,150.00         \$ 5.5           \$ 4,850.00         \$ 3,700.00         \$ 1,150.00         \$ 5.5           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,320.00         \$ 5.5           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,320.00         \$ 5.5           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,200			5	 	۱	67.52
\$         4,850.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         1,150.00         \$         \$         1,150.00         \$         1,150.00         \$         \$         1,150.00         \$         \$         1,150.00         \$         \$         1,150.00         \$	\$ 4,850.00         \$ 3,600.00         \$ 1,150.00         \$ 5.55           \$ 4,850.00         \$ 3,700.00         \$ 1,150.00         \$ 5.55           \$ 4,850.00         \$ 3,700.00         \$ 1,530.00         \$ 5.50.00           \$ 4,850.00         \$ 3,220.00         \$ 1,630.00         \$ 5.50.00           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,220.00           \$ 2016         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,260.00         \$ 6,000.00         \$ 6,000.00         \$ 6,000.00         \$ 5,260.00					\$	
\$         4,850.00         \$         3,700.00         \$         5,500.00         5,500.00         5,500.00         5,500.00         5,500.00         5,500.00         5,500.00         6,000.333         5         6,000.00         5         6,000.00         5,500.00         5,500.00         5,500.00         5,500.00         5,500.00         5,500.00         5,500.00         5,500.00         5,500.00         5,500.00         6,000.00         6,000.00         6,000.00         6,000.00         6,000.00         7,500.00         7,750.00         7,7	\$ 4,850.00         \$ 3,700.00         \$ 1,500.00         \$ 5,500.00           16         \$ 4,850.00         \$ 3,220.00         \$ 1,630.00         \$ 5,500.00           16         \$ 4,850.00         \$ 3,220.00         \$ 1,630.00         \$ 5,500.00           2016         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 6,450.00         \$ 6,450.00           2016         \$ 4,850.00         \$ 6,450.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00           2017         \$ 4,850.00         \$ 6,000.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 5,260.00         \$ (1,150.00)         \$ 2,260.00         \$ (1,150.00)         \$ 2,260.00         \$ (1,150.00)         \$ 2,260.00         \$ (1,150.00)         \$ 2,260.00         \$ (1,150.00)         \$ 2,260.00         \$ 2,260.00			9 6	_	8	77
\$ 4,850.00         \$ 4,850	\$ 4,850.00         \$ 4,300.00         \$ 1,630.00         \$ 5,520.00           16         \$ 4,850.00         \$ 3,220.00         \$ 1,630.00         \$ 5,520.00           2016         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,220.00         \$ 5,520.00           2016         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 6,000.00         \$ 1,600.00         \$ 5,200.00           2017         \$ 4,850.00         \$ 6,000.00         \$ (1,150.00)         \$ 5,200.00         \$ 1,150.00         \$ 5,200.00         \$ 5,200.00         \$ 1,150.00         \$ 5,200.00         \$ 1,150.00         \$ 5,200.00         \$ 2,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00         \$ 3,200.00<	_	ľ	9 6		\$	2   2
\$ 4,850.00         \$ 3,220.00         \$ 1,039.00         \$ 5.50         0.00458         \$ 9,814.00         \$ 44.99         0.008333         \$ 5           \$ 4,850.00         \$ 3,220.00         \$ 1,020.40         \$ 5.50         0.00458         \$ 9,814.00         \$ 44.99         0.008333         \$ 5           \$ 4,850.00         \$ 4,850.00         \$ 4,450.00         \$ 4,450.00         \$ 1,020.40         \$ 8,614.00         \$ 44.99         0.008333         \$ 8           \$ 4,850.00         \$ 4,850.00         \$ 4,450.00         \$ 1,020.40         \$ 8,614.00         \$ 3,48         0.008333         \$ 8           \$ 4,850.00         \$ 4,850.00         \$ 6,450.00         \$ 1,150.00	\$ 4,850.00         \$ 3,220.00         \$ 1,030.00         \$ 5,50.00           \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 5,20.00         \$ 5,500.00         \$ 5,500.00	-	-	7		\$	81.78
\$         4,850.00         \$         5,200.00         \$         (4/MOV)         \$         6,00458         \$         9,814.00         \$         4,681         0.008333         \$           \$         4,850.00         \$         4,850.00         \$         (4,00.00)         5,50         0.00479         \$         8,614.00         \$         4,681         0.008333         \$           \$         4,850.00         \$         6,450.00         \$         (1,600.00)         5,75         0.00479         \$         8,674.00         \$         35,48         0.008333         \$           \$         4,850.00         \$         6,400.00         \$         (1,150.00)         5,75         0.00479         \$         (5,740.0)         \$         33,42         0.008333         \$           \$         4,850.00         \$         5,100.00         \$         (1,150.00)         5,75         0.00479         \$         (5,740.0)         \$         33,42         0.008333         \$           \$         4,850.00         \$         5,240.00         \$         (1,100.00)         5,75         0.00479         \$         (5,740.0)         \$         20,49         0.008333         \$           \$ <t< td=""><td>\$         4,850.00         \$         5,320.00         \$         4,400.00         \$         5,520.00         <t< td=""><td>_</td><td></td><td>A (</td><td></td><td>\$</td><td>81.78</td></t<></td></t<>	\$         4,850.00         \$         5,320.00         \$         4,400.00         \$         5,520.00 <t< td=""><td>_</td><td></td><td>A (</td><td></td><td>\$</td><td>81.78</td></t<>	_		A (		\$	81.78
\$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 4,850.00         \$ 8,644.00         \$ 3,48         \$ 0,008333         \$ 8,644.00         \$ 3,48         \$ 0,008333         \$ 8,644.00         \$ 3,48         \$ 0,008333         \$ 8,544.00         \$ 3,48         \$ 0,008333         \$ 8,544.00         \$ 3,548         \$ 0,008333         \$ 8,544.00         \$ 3,548         \$ 0,008333         \$ 8,544.00         \$ 3,548         \$ 0,008333         \$ 8,540.00         \$ 3,548         \$ 0,008333         \$ 8,540.00         \$ 3,548         \$ 0,008333         \$ 8,540.00         \$ 3,548         \$ 0,008333         \$ 8,540.00         \$ 3,548         \$ 0,008333         \$ 8,540.00         \$ 3,548         \$ 0,008333         \$ 8,540.00         \$ 3,548         \$ 0,008333         \$ 8,548         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 3,548         \$ 0,008333         \$ 3,548         \$ 3,548         \$ 3,548         \$ 3,548         \$ 3,548         \$ 3,548	\$         4,850.00         \$         4,850.00         \$         4,850.00         \$         4,850.00         \$         4,850.00         \$         4,850.00         \$         4,850.00         \$         4,850.00         \$         2,850.00         \$         4,850.00         \$         2,260.00 <t< td=""><td></td><td></td><td>A</td><td>1</td><td>S</td><td>85.11</td></t<>			A	1	S	85.11
(6         S         4,550,00         S         4,450,00         S         3,540,00         S         3,54	6   S   4,850.00   S   6,450.00   S   7,600.00   S     5   4,850.00   S   6,450.00   S   7,150.00   S     5   4,850.00   S   6,000.00   S   7,150.00   S     5   4,850.00   S   5,260.00   S   7,100.00   S     5   4,850.00   S   5,420.00   S   7,100.00   S     5   4,850.00   S   5,420.00   S   7,500.00   S     5   4,850.00   S   4,500.00   S   3,50.00   S     5   4,850.00   S   4,500.00   S   3,50.00   S     7   5   4,850.00   S   4,500.00   S   3,50.00   S     8   7,850.00   S   4,500.00   S   3,50.00   S     9   17   S   4,850.00   S   4,500.00   S   3,50.00   S     18   S   4,850.00   S   4,500.00   S   8,50.00   S     18   S   4,850.00   S   4,900.00   S   8,50.00   S     19   S   4,850.00   S   4,900.00   S   8,50.00   S     10   S   4,850.00   S   4,900.00   S   8,50.00   S     11   S   4,850.00   S   4,900.00   S   8,50.00   S     12   S   4,850.00   S   4,900.00   S   8,50.00   S     13   S   4,850.00   S   4,900.00   S   8,50.00   S     14   S   5,900.00   S   4,900.00   S   8,50.00   S     15   S   S   S   S   S   S   S   S   S		Ì	Ą	$\downarrow$	S	71.78
\$         4,850,00         \$         6,450,00         \$         (1,500,00)         5.75         0,00479         \$         8,340,00         \$         35.38         0,008333         \$           \$         4,850,00         \$         6,000,00         \$         (1,150,00)         5.75         0,00479         \$         6,774,00         \$         35.28         0,008333         \$           \$         4,850,00         \$         5,260,00         \$         (1,150,00)         5.75         0,00479         \$         6,774,00         \$         22.22         0,008333         \$           \$         4,850,00         \$         5,260,00         \$         (170,00)         5.75         0,00479         \$         6,724,00         \$         22.22         0,008333         \$           \$         4,850,00         \$         5,100,00         \$         (150,00)         5.75         0,00479         \$         6,124,00         \$         22.22         0,008333         \$           \$         4,850,00 \$         \$         (1,100)         5.75         0,00479         \$         6,124,00         \$         22.24         0,008333         \$           \$         4,850,00 \$          <	\$         4,850.00         \$         6,450.00         \$         (1,000.00)         5           \$         4,850.00         \$         6,000.00         \$         (1,150.00)         5           \$         4,850.00         \$         5,260.00         \$         (410.00)         5           \$         4,850.00         \$         5,100.00         \$         (70.00)         5           \$         4,850.00         \$         5,260.00         \$         (110.00)         5           \$         4,850.00         \$         5,260.00         \$         (110.00)         5           \$         4,850.00         \$         4,500.00         \$         350.00         6           \$         4,850.00         \$         4,500.00         \$         350.00         6           \$         4,850.00         \$         4,500.00         \$         350.00         6           \$         4,850.00         \$         4,500.00         \$         350.00         6           \$         4,850.00         \$         4,900.00         \$         350.00         6           \$         4,850.00         \$         4,900.00         \$         50.00			0	$\perp$	<del>6</del>	71.11
\$         4,850.00         \$         4,930.00         \$         (1,10.00)         5.75         0,00479         \$         7,334.00         \$         2008333         \$           \$         4,850.00         \$         6,000.00         \$         (110.00)         5.75         0,00479         \$         6,747.00         \$         229.49         0,008333         \$           \$         4,850.00         \$         5,420.00         \$         (10.00)         5.75         0,00479         \$         6,124.00         \$         229.49         0,008333         \$           \$         4,850.00         \$         5,420.00         \$         (10.00)         5.75         0,00479         \$         6,124.00         \$         229.49         0,008333         \$           \$         4,850.00         \$         5,420.00         \$         350.00         6.25         0,00521         \$         5,84.00         \$         32.50         0,008333         \$           \$         4,850.00         \$         5,000.00         \$         350.00         6.25         0,00521         \$         5,84.00         \$         34.34         0,008333         \$           \$         4,850.00         \$	\$         4,850.00         \$         4,930.00         \$         (80.00)         \$           \$         4,850.00         \$         5,260.00         \$         (410.00)         \$         5           \$         4,850.00         \$         5,100.00         \$         (250.00)         \$         5           \$         4,850.00         \$         5,420.00         \$         (110.00)         \$         5           \$         4,850.00         \$         5,000.00         \$         (110.00)         \$         5           \$         4,850.00         \$         4,500.00         \$         350.00         \$         550.00         \$           \$         4,850.00         \$         4,500.00         \$         350.00         \$         6         550.00         \$         350.00         \$         6 <td></td> <td></td> <td>A 6</td> <td>_</td> <td>\$</td> <td>61.53</td>			A 6	_	\$	61.53
7         8         4,850.00         8         6,000.00         5         (1,10.00)         5.75         0,00479         \$         0,974.00         \$         22,22         0,008333         \$           8         4,850.00         \$         (1,10.00)         5.75         0,00479         \$         6,134.00         \$         29,49         0,008333         \$           8         4,850.00         \$         (10.00)         5.75         0,00479         \$         6,134.00         \$         29,49         0,008333         \$           8         4,850.00         \$         5,420.00         \$         (10.00)         5.75         0,00479         \$         6,044.00         \$         29,40         0,008333         \$           8         4,850.00         \$         4,960.00         \$         (10.00)         5.75         0,00421         \$         6,244.00         \$         29,40         0,008333         \$           10.7         \$         4,850.00         \$         4,500.00         \$         350.00         6.25         0,00521         \$         6,244.00         \$         36,14         0,008333         \$           10.7         \$         4,850.00         \$	7         \$         4,850.00         \$         6,000.00         \$         (4,10.00)         \$         5.260.00         \$         (4,10.00)         \$         5.260.00         \$         \$         (4,10.00)         \$			A G		S	85       
5         4,850.00         \$         7,100.00 <t< td=""><td>7         \$         4,850.00         \$         5,260.00         \$         (4,00.00)</td><td></td><td></td><td>9 6</td><td></td><td>S</td><td>26.03</td></t<>	7         \$         4,850.00         \$         5,260.00         \$         (4,00.00)			9 6		S	26.03
\$ 4,850.00         \$ 5,100.00         \$ (570.00)         \$ (575.00479)         \$ (513.00)         \$ (500.00333)         \$ (500.00479)         \$ (500.00)         \$ (500.000)	\$         4,850.00         \$         5,100.00         \$         (2,70.00)         \$           \$         4,850.00         \$         5,420.00         \$         (110.00)         \$           \$         4,850.00         \$         4,960.00         \$         (150.00)         \$           \$         4,850.00         \$         4,500.00         \$         350.00         \$           \$         4,850.00         \$         4,500.00         \$         350.00         \$           \$         4,850.00         \$         4,500.00         \$         350.00         \$           \$         4,850.00         \$         4,500.00         \$         850.00         \$           \$         5,100.00         \$         4,500.00         \$         850.00         \$           \$         4,850.00         \$         4,900.00         \$         850.00         \$           \$         4,850.00         \$         4,900.00         \$         850.00         \$           \$         4,850.00         \$         4,900.00         \$         850.00         \$           \$         \$         4,850.00         \$         4,900.00         \$         850.00<			200	_	\$	51.28
\$         4,850.00         \$         5,420.00         \$         (10,00)         5.75         0.00479         \$         6,044,00         \$         2,044,00         \$         0.008333         \$           \$         4,850.00         \$         4,850.00         \$         1,000.00         \$ <td>\$ 4,850.00         \$ 5,420.00         \$ (270.00)           \$ 4,850.00         \$ 4,960.00         \$ (110.00)         \$ (110.00)           \$ 4,850.00         \$ 5,000.00         \$ (110.00)         \$ (150.00)           \$ 4,850.00         \$ 4,500.00         \$ 350.00         \$ 350.00           \$ 4,850.00         \$ 4,500.00         \$ 350.00         \$ 350.00           \$ 5,007.7         \$ 4,850.00         \$ 4,500.00         \$ 350.00         \$ 350.00           \$ 5,107.7         \$ 4,850.00         \$ 4,000.00         \$ 850.00         \$ 350.00           \$ 7,850.00         \$ 7,100.00         \$ 850.00         \$ 850.00           \$ 8         \$ 4,850.00         \$ 4,900.00         \$ 850.00           \$ 8         \$ 4,850.00         \$ 4,900.00         \$ 850.00           \$ 8         \$ 4,850.00         \$ 4,900.00         \$ 850.00           \$ 8         \$ 4,850.00         \$ 4,000.00         \$ 850.00           \$ 8         \$ 4,000.00         \$ 850.00         \$ 850.00           \$ 8         \$ 4,000.00         \$ 850.00           \$ 8         \$ 8,000.00         \$ 8,000.00           \$ 8         \$ 8,000.00         \$ 8,000.00           \$ 8         \$ 8,000.00         \$ 8,000.00</td> <td></td> <td></td> <td>Ą</td> <td></td> <td>\$</td> <td>50.36</td>	\$ 4,850.00         \$ 5,420.00         \$ (270.00)           \$ 4,850.00         \$ 4,960.00         \$ (110.00)         \$ (110.00)           \$ 4,850.00         \$ 5,000.00         \$ (110.00)         \$ (150.00)           \$ 4,850.00         \$ 4,500.00         \$ 350.00         \$ 350.00           \$ 4,850.00         \$ 4,500.00         \$ 350.00         \$ 350.00           \$ 5,007.7         \$ 4,850.00         \$ 4,500.00         \$ 350.00         \$ 350.00           \$ 5,107.7         \$ 4,850.00         \$ 4,000.00         \$ 850.00         \$ 350.00           \$ 7,850.00         \$ 7,100.00         \$ 850.00         \$ 850.00           \$ 8         \$ 4,850.00         \$ 4,900.00         \$ 850.00           \$ 8         \$ 4,850.00         \$ 4,900.00         \$ 850.00           \$ 8         \$ 4,850.00         \$ 4,900.00         \$ 850.00           \$ 8         \$ 4,850.00         \$ 4,000.00         \$ 850.00           \$ 8         \$ 4,000.00         \$ 850.00         \$ 850.00           \$ 8         \$ 4,000.00         \$ 850.00           \$ 8         \$ 8,000.00         \$ 8,000.00           \$ 8         \$ 8,000.00         \$ 8,000.00           \$ 8         \$ 8,000.00         \$ 8,000.00			Ą		\$	50.36
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17         \$         4,850.00         \$         4,500.00         \$         35	17         \$         4,850.00         \$         4,500.00         \$         5,2017         \$         4,850.00         \$         4,500.00         \$         350.00         6         6         6,2017         \$         4,850.00         \$         4,500.00         \$         350.00         6         7 </td <td></td> <td></td> <td>A G</td> <td>_</td> <td>69</td> <td>2</td>			A G	_	69	2
177         \$         4,850.00         \$         4,500.00         \$         5,000         \$         5,044.00         \$         6,944.00         \$         6,944.00         \$         6,944.00         \$         6,008333         \$         6,944.00         \$         4,500.00         \$         350.00         \$         250.00         6.25         0.00521         \$         7,544.00         \$         39.29         0.008333         \$           317         \$         4,850.00         \$         5,100.00         \$         (50.00)         6.50         0.00542         \$         7,544.00         \$         40.59         0.008333           317         \$         4,850.00         \$         (50.00)         6.50         0.00542         \$         7,544.00         \$         40.59         0.008333           18         \$         4,850.00         \$         50.00         6.50         0.00542         \$         8,394.00         \$         45.40         0.008333           18         \$         4,850.00         \$         4,000.00         \$         850.00         6.50         0.00542         \$         8,844.00         \$         49.80         0.008333           \$         4,850.00 <td>17         \$         4,850.00         \$         4,500.00         \$         5,500.00         \$         5,500.00         \$         5,500.00         \$         5,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         8         6,500.00         \$         8         6,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00</td> <td></td> <td></td> <td>9 6</td> <td>_</td> <td>\$</td> <td>27.80</td>	17         \$         4,850.00         \$         4,500.00         \$         5,500.00         \$         5,500.00         \$         5,500.00         \$         5,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         6,500.00         \$         8         6,500.00         \$         8         6,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00         \$         8         8,500.00			9 6	_	\$	27.80
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17         \$         4,850.00         \$         4,000.00         \$         6.25         0.00542         \$         7,544.00         \$         40.59         0.008333           17         \$         4,850.00         \$         5,100.00         \$         (50.00)         6.50         0.00542         \$         7,544.00         \$         40.86         0.008333           \$         \$         4,850.00         \$         5,100.00         \$         55.00         6.50         0.00542         \$         7,544.00         \$         40.86         0.008333           \$         \$         4,850.00         \$         4,900.00         \$         850.00         6.50         0.00542         \$         8,844.00         \$         47.91         0.008333           \$         4,850.00         \$         4,000.00         \$         850.00         6.50         0.00542         \$         9,694.00         \$         72.51         0.008333           \$         4,850.00         \$         4,000.00         \$         850.00         6.50         0.00542         \$         9,194.00         \$         49.80         0.008333           \$         4,850.00         \$         5,350.00         \$	17         \$ 4,850.00         \$ 4,000.00         \$ 5,100.00         \$ (250.00)           17         \$ 4,850.00         \$ 5,100.00         \$ (50.00)         \$ (50.00)           8         \$ 4,850.00         \$ 4,800.00         \$ 850.00         \$ (50.00)           \$ 4,850.00         \$ 4,000.00         \$ 850.00         \$ (50.00)           \$ 4,850.00         \$ 4,000.00         \$ 850.00         \$ (500.00)           \$ 4,850.00         \$ 4,000.00         \$ 850.00         \$ (500.00)			4 6	L	\$	97.80
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2015   9/1/2016   5 1/100000   2016.246   5 1/10000   2016.246   5 1/10000   2016.246   5 1/10000   2016.246   5 1/10000   2016.246   5 1/10000   2017   1/18/2016   5 4/246.45   2017   1/18/2017   5 4/2000   2018   1/19/2018   5 2/2000   2018   1/19/2018   5 2/20000   2018	onus Deposited				DEF1461		N/A				
Columb   C	hamus & Peabor		1		DEF1465		N/A				
R	hamus & Peabo		_1_	1	DEF1468	1	N/A				
Page   2017   1/8/2017   \$ 40,000.00   DEE/2174   \$ 14,000.00   N/A   Sec Sep. Spreadshort for each Double   2018   1/9/2018   \$ 40,000.00   DEE/2174   \$ 14,000.00   N/A   Sec Sep. Spreadshort for each Double   2018   1/9/2018   \$ 25,000.00   DEE/1724   \$ 8,750.00   N/A   Sec Sep. Spreadshort for each Double   2018   1/9/2018   \$ 25,000.00   DEE/1724   \$ 8,750.00   N/A   Sec Sep. Spreadshort for each Double   2019   1/9/2018   \$ 25,000.00   DEE/1724   \$ 8,750.00   N/A   Sec Sep. Spreadshort for each Double   2019	homas Keller Re			1	371 CTGG		A/N		•	ģ	1
Sample   1/19/2018   Sample   1/19/2018   Sample   1/19/2018   Sample   1/19/2018   Sample	Very I as Verys			-	DEFEITO	1	A/N		Spreadsheet for e	ach Bonus	
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Mahoney adv. ] D-13-477883-D Dept. S	Attorney Fees	Date		April, 2 May, 20	June, 2016	July, 2016	Augus	Septemoci,	Nove	Dece	Janua	Febru	Marc	April 1	May		And Pind	Sept	<u> 8</u>	Non	ğ	Tan	됩	X V	May, 2018

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17         \$         3,500.00         \$           017         \$         3,500.00         \$           7         \$         3,500.00         \$           7         \$         3,500.00         \$           8         3,500.00         \$           9         3,500.00         \$           17         \$         3,500.00           1017         \$         3,500.00           2017         \$         3,500.00           2017         \$         3,500.00           2017         \$         3,500.00	ļ	-		0.00470	\$ 3.500.00	€9	16.77
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20000	9			0.00542		\$ 0	18.96
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5.25       0.00438       \$ 3,500.00       \$         5.25       0.00438       \$ 3,500.00       \$         5.25       0.00438       \$ 3,500.00       \$         5.25       0.00438       \$ 3,500.00       \$         Total Accrued Arrearage through December 2020: \$         Total Accrued Interest through December 2020: \$         Total Accrued Interest through December 2020: \$	
- \$ 3,500.00 - \$ 3,500.00 - \$ 3,500.00	
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dv. Mahoney	Shamus & Peabody LLC	Amo	888	16 \$ 2016 \$ 016 \$	\$ \$ \$ \$ \$ \$ \$	* * * *	9 8 8 8	September, 2017 \$ October, 2017 \$ November, 2017 \$ January, 2018 \$ February, 2018 \$ March, 2018 \$
Mahoney adv. D-13-477883-D	Dept. S Attorney Fees	Date Due	May, 2016 June, 2016 Tuly, 2016	August, 2016 September, 2016 October, 2016	November, 2016 December, 2016 January, 2017	February, 2017 March, 2017 April, 2017	May, 2017 June, 2017 July, 2017 August, 20	September, 20 October, 20 November, January, 20 February, 20

	,	000000		-	G	5 250 00	6.50	0.00542	<b>&gt;</b>	2,250.00	9	17:07
$\dashv$	ا م	5,250.00			9 6	5 250 00	6.50	0.00542	ક્ર	5,250.00	\$	28.44
$\dashv$	60	5,250.00	**	+	9 6	5 250 00	2007	0.00583	es.	5,250.00	\$	30.63
	8	5,250.00	×) (	_	A G	5,250.00	7.00	0.00583	85	5,250.00	\$	30.63
August, 2018	\$	5,250.00	8		A 6	5,250.00	7.00	0.00583	50	5,250.00	€4	30.63
September, 2018	€9	5,250.00	8	-	A G	5,250.00	7.00	0.00583	8	5,250.00	8	30.63
October, 2018	8	5,250.00	<b>₹</b>	-	A 6	2,250.00	7.00	0.00583	S	5,250.00	8	30.63
November, 2018	8	5,250.00	\$		A 6	5,250.00	7.00	0.00583	8	5,250.00	8	30.63
December, 2018	€>	5,250.00	8		A G	5,250.00	7.50	0.00625	S	5,250.00	84	32.81
January, 2019	s	5,250.00	<b>₩</b>	_	A 6	2,250.00	7.50	0.00625	S	5,250.00	↔	32.81
February, 2019	S	5,250.00	<b>∞</b>	1	ء ام	5,250.00	7.50	0.00625	S	5,250.00	89	32.81
March, 2019	s l	5,250.00	so •		٥	5,250.00	7.50	0.00625	8	5,250.00	€9	32.81
April, 2019	<b>⇔</b>	5,250.00	€	,	A	2,230.00	05.7	0.00625	89	5,250.00	€2	32.81
May, 2019	S	5,250.00	8	<del>-  </del>	ام	2,250.00	00.7	50000	4	5,250.00	<b>∽</b>	32.81
June, 2019	ક્ક	5,250.00	8		S	5,250.00	7.50	0.0000	9 64	5 250 00	69	32.81
	€>	5,250.00	€\$		s)	5,250.00	7.50	50000	9 64	5 250.00	5/2	32.81
Augut, 2019	↔	5,250.00	↔	1	s l	5,250.00	7.50	0.00025	9 64	5 250 00	) See	32.81
September, 2019	S	5,250.00	€	ı	S	5,250.00	7.50	0.0000	9 64	5 250 00	64	32.81
December, 2019	↔	5,250.00	8	-	S	5,250.00	7.50	0.00625	÷ 64	5 250 00	S-S-S-S-S-S-S-S-S-S-S-S-S-S-S-S-S-S-S-	32.81
November, 2019	↔	5,250.00	€9	,	€>	5,250.00	00./	0.0000	9 6	5 250 00	4	29.53
January, 2020	85	5,250.00	\$	1	8	5,250.00	6.75	0.00203	9 6	5 250 00	· 4	29.53
Fehruary, 2020	S	5,250.00	<del>\$</del>		8	5,250.00	6.75	0.00203	9 6	5 250 00	9	29.53
March, 2020	S	5,250.00	69	Į	<del>S</del>	5,250.00	6.75	0.00563	9 6	5 250 00	9 64	29 53
April, 2020	8	5,250.00	\$	-	S	5,250.00	6.75	0.00563	9 6	5 250 00	9 64	29.53
May. 2020	<del>⇔</del>	5,250.00	\$	1	S	5,250.00	6.75	0.00363	9 6	5 250 00	» &	29 53
June, 2020	82	5,250.00	\$	,	8	5,250.00	6.75	0.00363	9 6	5 250 00	9 64	22.97
July, 2020	S	5,250.00	s <del>s</del>		S	5,250.00	5.75	0.00438	9 6	5 250.00	S	22.97
August, 2020	S	5,250.00	8		es	5,250.00	5.25	0.00438	9 6	5 250.00	64.	22.97
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5.25       0.00438       \$ 5,250.00       \$ 22.97         5.25       0.00438       \$ 5,250.00       \$ 22.97         5.25       0.00438       \$ 5,250.00       \$ 1,561.88         Total Accrued Arregage through December 2020:       \$ 5,250.00       \$ 5,250.00	ed Intelest unough TOTAL SUM DUE: \$ 6,811.88	
\$ 5,250.00 5.25 \$ 5,250.00 5.25 \$ 5,250.00 5.25 \$ 5,250.00 Total Accrued	Total Accru	
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	Shamus &	 ⊗		,	2/15/2016	\$ 2,105.98	DEF1465				
Attorney Fees	Peabody LLC	LIC	2010	7		Lund	Monthly	Acc	Accrued	Monthly	thly
Control				Mo	Monthly	Interest Rate	Interest Rate as	Arre	Arrearage	Interest	est
Date Due	Amount Due	Due	Payment	Arre	Arrearage	(percent)	Factor	e	727 09	€	3.53
		_		6	737 09	5.75	0.00479	A 6	737 09		3.53
A 2017	8	737.09 \$		9 6	727 00	5.75	0.00479		00 1.01	,	3.53
Mox. 2017	S	737.09 \$		A	727 00	5.75	0.00479	· 0	70.107	┸	3.84
Time 2017		737.09	•	A	727 00	6.25	0.00521	<b>S</b>	727.02	_	3.84
June, 2017		737.09	٠	A	727 00	6.25	0.00521	S	13/.09	_	3.84
July, 2017		737.09	-	A	20.7.67	6.25	0.00521	A	20.101	9 6	3.84
August, 2017			€	A	10/10/	625	0.00521	8	757.09	_	2 84
September, 2017			; &A	S	/37.09	6.25	0.00521	S	737.09		2.84
October, 2017	9 6	737 09	8	8	/3/.09	20.0	0.00521	<b>⇔</b>	737.09	_+	1000
November, 2017		727 00	·	\$	737.09		0.00542	S	737.09	8	22.5
December, 2017		13.1.00		85	737.09		0.00542	89	737.09		5.99
January, 2018		13/50		85	737.09		0.0020	4	737.09		3.99
February, 2018	8	737.09	A 6	64	737.09		0.00342	9	737.09	<b>└</b> ─	3.99
March, 2018	\$	737.09		5/3	737.09		0.00542	9 64	737.09	\$ 6	3.99
April, 2018	8	737.09			737.09		0.00542	3 6	737.09	<b>↓</b>	3.99
May, 2018	€⁄3	737.09	×)	9 4	737.09	6.50	0.00542	9 6	737 09	1-	4.30
Time, 2018	59	737.09		9 6	737.09		0.00583	A 6	737 09	—	4.30
July, 2018	\$	737.09		96	737.09	7.00	0.00583	9 6	737 09		4.30
August, 2018	ક	737.09		9	737.09	9 7.00	0.00583	9 6	737.09	↓_	4.30
Sentember, 2018	8	737.09	201	9 64	737.09	7.00	0.00583	9 6	737 09	↓_	4.30
October, 2018	8	737.09	-+	9 6	737.09	9 7.00	0.00583	9 6	737 09	┼	4.30
November 2018	\$	737.09	-+	9 6	737 09	9 7.00	0.00583	A 6	737 09	┦—	4.61
December, 2018	<b>├</b>	737.09	-+	9 6	737.09	7.50	0.00625	A 6	737 00	4	4.61
Tamiary 2019		737.09	_+	9 6	737.09	7.50	0.00625	$\dashv$	737 09		4.61
Fehruary, 2019	一	737.09	\$	9 6	737.09	7.50	0.00625	$\dagger$	737 09		4.61
March, 2019	-	737.09	89	9 6	737.09	9 7.50	0.00625			_1	
April, 2019	€\$	737.09		9							AA000439

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Ady, 2019 \$  fune, 2019 \$  fully, 2019 \$  Augut, 2019 \$  September, 2019 \$  November, 2019 \$  March, 2020 \$  April, 2020 \$  May, 2020 \$  June, 2020 \$  August, 2020 \$  July, 2020 \$  September, 2020 \$  November, 2020 \$  Cotober, 2020 \$  December, 2020 \$  November, 2020 \$  December, 2020 \$  November, 2020 \$  TOTALS \$
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	!							+	2017
Attorney Fees	Thomas Keller R	eller R	2016	7/22/2016	\$ 4,646.45	DEF1468	\$ 1,626.26	티	/107
	Amount Due	Due	Payment	Monthly	Interest Rate	Interest Rate as	Accrued Arrearage	Monthly Interest	ř ý
A	-	1 676 76	1	\$ 1.626.26	5.75	0.00479	\$ 1,626.26	\$	7.79
May 2017		1 626 26			5.75	0.00479			7.79
Fine, 2017		1,626.26	1		5.75	0.00479			7.79
Tuly 2017		1.626.26	· S	\$ 1,626.26	6.25	0.00521			8.47
Angust 2017		1 626 26	·		6.25	0.00521	\$ 1,626.26		8.47
Sentember 2017		1,626.26	-	\$ 1,626.26	6.25	0.00521			8.47
October 2017		1.626.26	5		6.25	0.00521			8.47
November 2017		1 626 26	·	\$ 1,626.26	6.25	0.00521	\$ 1,626.26		8.47
December 2017		1 626.26			6.25	0.00521	\$ 1,626.26		8.47
Tampary 2018		1.626.26		\$ 1,626.26	6.50	0.00542	\$ 1,626.26	_	8.81
February 2018		1 626 26	•		6.50	0.00542	\$ 1,626.26	1	8.81
March 2018		1 626 26	1			0.00542	\$ 1,626.26		8.81
Amil 2018		1 626 26	-		6.50	0.00542			8.81
Max. 2018		1 626 26	€9		6.50	0.00542	\$ 1,626.26	\$ 9	8.81
Inne 2018		1 626 26		\$ 1,626.26	6.50	0.00542			8.81
Tuly, 2018		1.626.26	· S		7.00	0.00583			9.49
Anonst 2018		1,626.26	-		7.00	0.00583	\$ 1,626.26		9.49
Sentember, 2018	6/3	1,626.26	ı <b>⇔</b>		7.00	0.00583		_	9.49
October, 2018	S	1,626.26	·	\$ 1,626.26	7.00	0.00583			9.49
November 2018	6/	.626.26	۱ ج	\$ 1,626.26	7.00	0.00583			9.49
December 2018	64	1 626 26	- F		7.00	0.00583		&	9.49
Townser 2019		1 626 26	64		7.50	0.00625	\$ 1,626.26	\$	10.16
February, 2017	-1,	1,626.26		\$ 1,626.26	7.50	0.00625	\$ 1,626.26	$\rightarrow$	10.16
March 2019		1 626 26	9	· · ·	7.50	0.00625	\$ 1,626.26	- 1	10.16
April 2019		1,626.26	65	\$ 1,626.26	7.50	0.00625	i		10.16
May 2019	\$	.626.26	5	\$ 1,626.26	7.50	0.00625	\$ 1,626.26	\$ 9	10.16
12 x x x 2 2 x x x x x x x x x x x x x x									

1,020.20       7.50       0.00625       \$         1,626.26       7.50       0.00625       \$         1,626.26       7.50       0.00625       \$         1,626.26       7.50       0.00625       \$         1,626.26       7.50       0.00625       \$         1,626.26       6.75       0.00625       \$         1,626.26       6.75       0.00563       \$         1,626.26       6.75       0.00563       \$         1,626.26       6.75       0.00563       \$         1,626.26       6.75       0.00563       \$         1,626.26       6.75       0.00563       \$         1,626.26       6.75       0.00438       \$         1,626.26       6.75       0.00438       \$         1,626.26       5.25       0.00438       \$         1,626.26       5.25       0.00438       \$         1,626.26       5.25       0.00438       \$         1,626.26       5.25       0.00438       \$         1,626.26       5.25       0.00438       \$         1,626.26       5.25       0.00438       \$         1,626.26       5.25       0.00438					6	1 626 26	7.50	0.00625		1,626.26	<del>69</del>	10.16
\$ 1,626.26 \$ - \$ 1,020.20 \$ 1,626.26 \$ - \$ 1,626.26  \$ 1,626.26 \$ - \$ 1,626.26  1019 \$ 1,626.2	June, 2019		79.79	1	6 م	1,020.20	05.7	5 0 0 0 0		.626.26	€9	10.16
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1019 \$ 1,626.26 \$ - \$ 1,626.26   1,626.26   1,626.26   2,019   2,1626.26   2,019   2,1626.26   2,019   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26   2,020   2,1626.26	Augut, 2019		26.26	\$		1,020.20	05.7	509000		626.26	8	10.16
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20       \$ 1,626.26       \$ -       \$ 1,626.26         3       1,626.26       \$ -       \$ 1,626.26         4       \$ 1,626.26       \$ -       \$ 1,626.26         5       1,626.26       \$ -       \$ 1,626.26         5       1,626.26       \$ -       \$ 1,626.26         5       1,626.26       \$ -       \$ 1,626.26         5       1,626.26       \$ -       \$ 1,626.26         5       1,626.26       \$ -       \$ 1,626.26         5       1,626.26       \$ -       \$ 1,626.26         5       1,626.26       \$ -       \$ 1,626.26         5       1,626.26       \$ -       \$ 1,626.26         7020       \$ 1,626.26       \$ -       \$ 1,626.26         7020       \$ 1,626.26       \$ -       \$ 1,626.26         7020       \$ 1,626.26       \$ -       \$ 1,626.26         8       1,626.26       \$ -       \$ 1,626.26         10       \$ 1,626.26       \$ -       \$ 1,626.26	Terrory 200		26.26	-	S	1,626.26	6.75	0.00563		07.070,	•	7.10
\$\begin{array}{c c c c c c c c c c c c c c c c c c c	January, 2020		26.26		6	1,626.26	6.75	0.00563		,626.26	64	5.15
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\$ 1,626.26 \$ - \$ 1,626.26 \$ 20	May, 2020		26.26		م	1,626.20	0.75	0.00202		162626	<b>V</b>	9.15
\$ 1,626.26 \$ - \$ 1,626.26 \$   \$   \$   \$   \$   \$   \$   \$   \$   \$	Time, 2020		26.26	•	↔	1,626.26	6.75	0.0000		606.06	9 6	7 11
20 \$ 1,626.26 \$ - \$ 1,626.26 ,2020 \$ 1,626.26 \$ - \$ 1,626.26 020 \$ 1,626.26 \$ - \$ 1,626.26 ,2020 \$ 1,626.26 \$ - \$ 1,626.26 ,2020 \$ 1,626.26 \$ - \$ 1,626.26 <b>TALS</b> \$ 1,626.26 \$ - \$ 1,626.26	11 2020	ľ	26.26	·	<del>69</del>	1,626.26	5.25	0.00438		07.070,1	9 6	117
\$ 1,626.26 \$ - \$ 1,626.26 \$ 1,626.26 \$ - \$ 1,626.26	July, 2020		36.36		64	1.626.26	5.25	0.00438		1,626.26	2	/.11
\$ 1,626.26 \$ - \$ 1,626.26 \$ 1,626.26 \$ - \$ 1,626.26	August, 2020	9	07.070	÷ =	9	1,626.26	5.25	0.00438	•	1,626.26	<del>\$</del>	7.11
\$ 1,626.26 \$ - \$ 1,020.20 \$ 1,626.26 \$ - \$ 1,626.26 \$ 1,626.26 \$ - \$ 1,626.26 \$ 1,626.26 \$ - \$ 1,626.26 To	September, 2020	SA.	07.070	A	9 6	1,02026	505	0.00438		1,626.26	s	7.11
\$ 1,626.26 \$ - \$ 1,626.26 \$ 1,626.26 \$ - \$ 1,626.26 \$ \$ 1,626.26 \$ - \$ 1,626.26 To	October, 2020		526.26	-		1,020.20	7.75	0.00138		1 626 26	S-2	7.11
\$ 1,626.26 \$ - \$ 1,626.26 \$ \$ 1,626.26 \$ - \$ 1,626.26 To	November, 2020		526.26	٠	S	1,626.26	5.23	0.00420		1 626 26	· &	7.11
\$ 1,626.26 \$ - \$ 1,626.26 To	December 2020	•	526.26	١	S	1,626.26	5.25	0.00400		1,040.1		30 25
Total Accrued Arrearage through December 2020: Total Accrued Interest through December 2020: Total Accrued Interest through December 2020: TOTAL SUM DUE:	TOTALS	\$	526.26		8	1,626.26				07.079	9	20.070
Total Accrued Interest through December 2020: Total Accrued Interest through December 2020: TOTAL SUM DUE:					_		Total Acomised	A rrearage through	n Decemi	ber 2020	\$	1,626.26
TOTAL SUM DUE:							nonioou rent	Company of the control of the contro	Tocom!	CUC TOTAL	9	393.35
TOTALSUMBOE							Total Accrue	ed Interest Intolug			SN 389	2010
								10	LALSO	N DUE	0	7,012,01
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DEF2176 \$ 1		
L	6.50 6.50 6.50 6.50 7.00 7.00 7.00 7.00 7.00 7.00 7.00 7.50	
100	Arrearage 14,000.00	
ihoney  Wynn Las Vegas	Payment S	\$ 14,000.00   \$
	Attorney recs  Date Due  Amoli, 2018  May, 2018  July, 2018  September, 2018  November, 2018  Tanuary, 2019  May, 2019  September, 2019  May, 2019  May, 2019  September, 2019  September, 2019  May, 2019  September, 2019  September, 2019  September, 2019  May, 2019  September, 2019  September, 2019  September, 2019  May, 2020  March, 2020  April, 2020  March, 2020  April, 2020	

61.25	61.25	61.25	61.25	61.25	60.10	00.02C,2	14 000.00	2.520.00	16,520.00		
14,000.00	14,000.00	14,000.00 \$	14,000.00 \$	14,000.00 \$	14,000.00	14,000.00 \$	S OCUCE I	ecember 2020 3	TOTAL SIM DUE: \$		
0.00438	0.00438	0.00438	0.00438 \$	0.00438 \$	0.00438	\$		Total Accrued Arrearage through December 2020:	Total Accrued Interest through December 2020	PT CT	
	27.5	5.23	5.05	5.25	5.25			Total Accrued A	Total Accrued		
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	5	·	1	-		9	S				
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	T 0000 + +	July, 2020	10%	October, 2020	$\Box$	December, 2020	TOTALS \$				

Mahoney adv. Mahoney	ahoney	-								
D-13-477883-D						1,110				
Dept. S										
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Attorney Fees	Wvnn L	Wynn Las Vegas	2018		1/19/2018	\$ 40,000.00	DEF2174	\$ 14,000.00	Due Ay	Due April 2019
		)				Annual Legal	Monthly	Accriied	Mo	Monthly
Date Due	Amo	Amount Due	Payment	^ \Z	Monthly Arrearage	Interest Rate	Interest Rate as	Arrearage	Late	Interest
					14 000 000	(per cent)	0.00625	\$ 14 000 00	8	87.50
April, 2019	\$ 1	14,000.00	-	A	14,000.00	05.7	20000		4	87.50
May, 2019	#	#REF!	-		#KEE:	05./	0.00023		4	07.50
June, 2019	#	#REF!	\$		#REF!	7.50	0.00625		4	00.70
Tuly 2019	8	14,000,00	€	65	14,000.00	7.50	0.00625	\$ 14,000.00	<b>S</b>	87.50
A 13 man + 2010		14 000 00	- -	s	14,000.00	7.50	0.00625	\$ 14,000.00	643	87.50
Scatterbor 2010		14 000 00	•	64	14,000.00	7.50	0.00625	\$ 14,000.00	8	87.50
Depication, 2010		14 000 00		67	14.000.00	7.50	0.00625	\$ 14,000.00	S	87.50
December, 2012		14 000 00	1	, G	14,000.00	7.50	0.00625	\$ 14,000.00	8	87.50
November, 2019		14 000 00	-	. es	14,000.00	6.75	0.00563	\$ 14,000.00	ક્ક	78.75
Dallually, 2020		14 000 00	1	· &	14,000.00	6.75	0.00563	\$ 14,000.00	8	78.75
March 2020		14 000 00	· •	S	14,000.00	6.75	0.00563	\$ 14,000.00	۶۹	78.75
Amil 2020		14 000 00	- S	65	14,000.00	6.75	0.00563	\$ 14,000.00	€>	78.75
Max: 2020		14 000 00	1 6/2	69	14,000.00	6.75	0.00563	\$ 14,000.00	8	78.75
Iviay, 2020		14 000 00		8	14,000.00	6.75	0.00563	\$ 14,000.00	8	78.75
June, 2020		14 000 00	· •	67.	14,000.00	5.25	0.00438	\$ 14,000.00	\$	61.25
July, 2020		14 000 00	) s	64	14,000.00	5.25	0.00438	\$ 14,000.00	S	61.25
August, 2020	9 6	14 000 00	9 64	· C	14,000,00	5.25	0.00438	\$ 14,000.00	\$	61.25
September, 2020	9 6	14 000 00	9 &		14 000 00	5.25	0.00438	\$ 14,000.00	\$	61.25
October, 2020		14,000.00	9		22222					

14 000 001 8 61.25	÷  6	14,000.00 \$ 01.23	14.000.00 \$ 1,540.00		14.000.00		ľ	TOTAL SUM DUE:	
	0.00438	0.00438				Total Accrued Arrearage through December 2020:	Total Accrued Interest through December 2020: 3	TOTA	
	5.25		Total Control	0		Total Accrue	Total Accr		
	14 000 00	0.000,+I	\$ 14,000.00	\$ 14,000.00					
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		14,000.00	14 000 00	\$ 14,000,00	20-000-1				
		Morramber 2020	\$ 14 000 00 \$	December, 2020	TOTALS				

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Dept. S							
	Golden		į		6701444		Dir. Ameil 2010
	Entertainment -	2018	6/8/2018	\$ 25,000.00	DEF1865	o,/20.00	בוחד חולא שחל
			Monthly	Annual Legal	Monthly	Accrued	Monthly
Date Due	Amount Due	Payment	Arrearage	Interest Rate	Interest Rate as	Arrearage	Interest
				(her ceπt)	ractor .		
April, 2019	\$ 8,750.00	٠	\$ 8,750.00	7.50	0.00625		
May, 2019	\$ 8,750.00	-	\$ 8,750.00	7.50	0.00625		***************************************
Time, 2019		<u> </u>	\$ 8,750.00	7.50	0.00625		į
Trily 2019		€	\$ 8,750.00	7.50	0.00625		
Anont 2019		-	\$ 8,750.00	7.50	0.00625		
Sentember 2019	\$ 8.750.00	69		7.50	0.00625		į
December 2019				7.50	0.00625		\$ 54.69
		8		7.50	0.00625	\$ 8,750.00	
Tamiary 2020	\$ 8.750.00	8		6.75	0.00563		
Fehruary 2020	ļ	╄		6.75	0.00563		
March 2020		+		6.75	0.00563		
Anril 2020	8 8.750.00	$\vdash$		6.75	0.00563	\$ 8,750.00	\$ 49.22
May 2020		↓	\$ 8,750.00	6.75	0.00563		
Tune 2020		- €	\$ 8,750.00	6.75	0.00563	\$ 8,750.00	€>
Fully 2020		+-	\$ 8,750.00	5.25	0.00438		8
Angust 2020		┿		5.25	0.00438	\$ 8,750.00	8
Sentember, 2020		╁	\$ 8,750.00	5.25	0.00438		<del>⇔</del>
October, 2020	\$ 8,750.00	<del> </del>		,	0.00438	\$ 8,750.00	
November, 2020		├	\$ 8,750.00		0.00438		
December 2020		-		5.25	0.00438		
TOTALS	69					\$ 8,750.00	\$ 962.50
				Тота! Асспе	Total Accrued Arrearage through December 2020:	n December 2020:	8,750.00
				Total Accru	Total Accrued Interest through December 2020:	i December 2020.	\$ 962.50
					TO	TOTAL SUM DUE:	8 9,712.50

Monthly Interest   S   158.26   S   158.26   S   158.26   S   123.09   S   123.30	
\$ 28,134.57 Due  Accrued  Arrearage  \$ 28,134.57 \$  \$ 38,134.57 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$  \$ 38,134.58 \$	
80,384.49 DEF1756 \$ 28,134.57 Derest Rate Interest Rate as Arrearage Factor 0.00563 \$ 28,134.57 \$ 0.00563 \$ 28,134.57 \$ 0.00563 \$ 28,134.57 \$ 0.00438 \$ 0.00438 \$ 0.0044	
Annual Legal Interest Rate Inte (percent) 6.75 6.75 5.25 5.25 5.25 5.25 5.25 5.25 5.25 5	
Monthly Arrearage 28,134.57 28,134.57 28,134.57 28,134.57 28,134.57 5 28,134.57 5 28,134.57 5 28,134.57 5 28,134.57 5 28,134.57 5 28,134.57 5 28,134.57 5 28,134.57 5 28,134.57	
Payment	
wunt Due 28,134.57 28,134.57 28,134.57 28,134.57 28,134.57 28,134.57 28,134.57 28,134.57 28,134.57 28,134.57	-
Mahoney adv. Mahoney           D-13-477883-D           Dept. S           Attorney Fees         Resorts           April, 2020         \$           June, 2020         \$           July, 2020         \$           July, 2020         \$           July, 2020         \$           July, 2020         \$           September, 2020         \$           November, 2020         \$           November, 2020         \$           December, 2020         \$           December, 2020         \$           December, 2020         \$           December, 2020         \$           TOTALS         \$	

Mahoney adv. Mahoney	ahoney						***************************************
D-13-477883-D							
Dept. S			. :				
, T. C. C. C. C. C. C. C. C. C. C. C. C. C.							
	Resorts World	2019	6/6/2019	\$ 25,000.00	DEF1724	\$ 8,750.00	Due April 2020
			N/A=+16.1	Annual Legal	Monthly	Accriled	Monthly
Date Due	Amount Due	Payment	Arrearage	Interest Rate	Interest Rate as Factor	Arrearage	Interest
A1 2020	00 057 8 3	<b>∀</b>	\$ 8.750.00	6.75	0.00563	\$ 8,750.00	\$ 49.22
Max; 2020		-		6.75	0.00563	\$ 8,750.00	\$ 49.22
Tune 2020		┷		6.75	0.00563	\$ 8,750.00	\$ 49.22
Trily 2020	\$ 8.750.00	╁	\$ 8,750.00	5.25	0.00438	\$ 8,750.00	\$ 38.28
Angret 2020	\$ 8.750.00	-	\$ 8,750.00	5.25	0.00438	\$ 8,750.00	\$ 38.28
Sentember 2020	9	—		5.25	0.00438	\$ 8,750.00	\$ 38.28
October 2020	9 6			5.25	0.00438	\$ 8,750.00	\$ 38.28
November 2020	e e e	┷		5.25	0.00438	\$ 8,750.00	89
December 2020	· •	- S	\$ 8,750.00	5.25	0.00438	\$ 8,750.00	\$ 38.28
TOTALS	÷ 4	1000	\$ 8,750.00			\$ 8,750.00	\$ 377.34
							And the state of t
				Total Accrued	Total Accrued Arrearage through December 2020:	December 2020:	\$ 8,750.00
				Total Accru	Total Accrued Interest through December 2020:	1 December 2020:	\$ 377.34
					TO	TOTAL SUMDUE:	\$ 9,127.34

## EXHIBIT "B"

	Amount	\$500.00	,	\$591.00	\$500.00	\$591.00	\$500.00	\$591.00	\$500.00	\$591.00	\$500.00
	Actions	See details		See details	See details	See details	See details	See details	See details	See details	See details
	st recent Type	Real-time	None Trans	Real-time							
	ment Activity for Received Money, sorted by date received, most recent	AGINOMA	BART MAHONET	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY
ctivity table	Received Money, so		Completed								
Print QuickPay activity table	ment Activity for F	Date received	Nov 11, 2020	Oct 22, 2020	Oct 7, 2020	Sep 21, 2020	Sep 6, 2020	Aug 20, 2020	Aug 6, 2020	Jul 23, 2020	Jul 9, 2020

Amount		\$500.00	\$500.00	\$591.00	\$500.00	\$591.00	\$591.00	\$291.00	\$800.00	\$1,091.00	\$1,091.00
,	Actions	See details	See details	See details	See details	See details	See details	See details	See details	See details	See details
ost recent	Type	Real-time									
ment Activity for Received Money, sorted by date received, most recent	Sender	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY	BART MAHONEY
eceived Money, sor	Status	Completed									
ment Activity for R	Date received	Jun 6, 2020	May 15, 2020	May 4, 2020	Apr 25, 2020	Apr 16, 2020	Apr 4, 2020	Mar 19, 2020	Mar 8, 2020	Feb 10, 2020	Jan 28, 2020

ment Activity for ]	Received Money,	ment Activity for Received Money, sorted by date received, most recent	ost recent		
Date received	Status	Sender	Type	Actions	Amount
Jan 9, 2020	Completed	BART MAHONEY	Real-time	See details	\$1,091.00
Dec 25, 2019	Completed	BART MAHONEY	Real-time	See details	\$1,091.00
Dec 12, 2019	Completed	BART MAHONEY	Real-time	See details	\$1,091.00
Nov 21, 2019	Completed	BART MAHONEY	Real-time	See details	\$1,092.00
Nov 5, 2019	Completed	BART MAHONEY	Real-time	See details	\$891.00
Nov 1, 2019	Completed	BART MAHONEY	Real-time	See details	\$200.00
Oct 23, 2019	Completed	BART MAHONEY	Real-time	Sec details	\$600.00
Oct 3, 2019	Completed	BART MAHONEY	Real-time	See details	\$1,500.00

You've reached the end of your activity.

#### 1 **CSERV** 2 DISTRICT COURT 3 CLARK COUNTY, NEVADA 4 5 CASE NO: D-13-477883-D Bartholomew M Mahoney, 6 Plaintiff DEPT. NO. Department S 7 vs. 8 Bonnie M Mahoney, Defendant. 9 10 AUTOMATED CERTIFICATE OF SERVICE 11 This automated certificate of service was generated by the Eighth Judicial District 12 Court. The foregoing Findings of Fact, Conclusions of Law and Judgment was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled 13 case as listed below: 14 Service Date: 12/24/2020 15 rgiuliani@att.net "Roger Giuliani, Esq.". 16 aaron@grigsbylawgroup.com 17 Aaron Grigsby 18 kstutzman@radfordsmith.com Kimberly Stutzman 19 cJanson@radfordsmith.com Courtney Janson 20 firm@radfordsmith.com Firm RJS 21 22 23 24 25 26 27

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12/31/2020 8:46 PM
Steven D. Grierson
CLERK OF THE COURT

**MEMC** 

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RADFORD J. SMITH, CHARTERED

KIMBERLY A. STUTZMAN, ESQ.

Nevada Bar No. 014085

2470 St. Rose Parkway, Suite 206

Henderson, Nevada 89074

Telephone: (702) 990-6448

Facsimile: (702) 990-6456

firm@radfordsmith.com Attorneys for Defendant

## DISTRICT COURT FAMILY DIVISION CLARK COUNTY, NEVADA

BARTHOLOMEW M. MAHONEY, JR.,

Plaintiff,

vs.

BONNIE M. MAHONEY,

Defendant.

CASE NO.: D-13-477883-D

DEPT NO.: S

# <u>DEFENDANT'S MEMORANDUM OF FEES, COSTS AND DISBURSEMENTS</u> <u>AND BRUNZELL DECLARATION</u>

COMES NOW Defendant, BONNIE M. MAHONEY ("Bonnie"), by and through her attorneys, Kimberly A. Stutzman, Esq. of Radford J. Smith, Chartered, and hereby submits the following Memorandum of Fees, Costs and Disbursements pursuant to the Court's direction at the December 3, 2020 Evidentiary Hearing. A copy of the Bill History for the discovery issues is filed as Exhibit "A" including:

1. Photocopying:

\$ 336.50

2. Legal Research:

\$ 93.76

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	2	Expert Fees (for Trial Only):	\$ 0								
1	3.	•									
2	4.	Process Server:	\$ 750.00								
3	5.	Filing Fees:	\$ 109.00								
5	6.	Witness Fees:	\$ 26.00								
6	7.	Postage:	\$24.54								
7 8	8.	Attorney's Fees:	\$24,185.00								
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10		-1. T	\$25,524.80								
11	TO	ΓAL	ΨΔΟςΟΔΤίΟΟ								
12	DA	TED this 31 December 2020.									
13	RADFOR	D J. SMITH, CHARTERED									
14											
15	/s/ Kimberly A. Stutzman KIMBERLY A. STUTZMAN, ESQ.										
16	KIMBERLY A. STUTZMAN, ESQ.   Nevada Bar No. 014085										
17	2470 St. Rose Parkway, Suite 206										
18		Henderson, Nevada 89074 Attorneys for Defendant									
19	Auorneys   	jor Dejenuuru									
20	I.										
21		STATEMENT OF FACTS									
22	$\parallel$ The	e parties, Defendant, BONNIE MAHONEY ("I	Bonnie"), age 49, and Plaintiff,								
23											
24	BARTHO	DLOMEW MAHONEY ("Bart"), age 54 were d	ivorced by stipulated Decree of								
25	Divorce (	"Decree") filed February 3, 2016.									
26		,									
27											
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The parties have two minor children, BRIGITTE MAHONEY ("Brigitte"), born October 29, 2001 (age 19), and SOPHIA MAHONEY ("Sophia"), born June 12, 2004 (age 16).

At the December 3, 2020 Evidentiary Hearing, the Court granted Bonnie's Motions. The Court further ordered that it was inclined to grant most of the attorney's fees and costs for preparation of the hearing. As a result, Bonnie submits this Memorandum of Fees and Costs. She requests that the Court enter an order directing Bart to pay all of Bonnie's reasonable attorney's fees and costs that she has incurred related to her Motion filed May 9, 2019.

II.

#### ATTORNEY FEE'S AND COSTS

As discussed above, Bart has multiplied these proceedings and as a result, Bonnie has incurred attorney's fees and costs in the prosecution of this Motion. A request for an order directing another party to pay attorney's fees must be based upon statute, rule or contractual provision. See, e.g, Rowland v. Lepire, 99 Nev. 308, 662 P.2d 1332 (1983). Here, there is a statutory mandate for an award of fees against a party shown to be in arrearages in child support (NRS 125B.140).

NRS 18.010 states in relevant part -

- 1. The compensation of an attorney and counselor for his or her services is governed by agreement, express or implied, which is not restrained by law.
- 2. In addition to the cases where an allowance is authorized by specific statute, the court may make an allowance of attorney's fees to a prevailing party:

(a) When the prevailing party has not recovered more than \$20,000; or (b) Without regard to the recovery sought, when the court finds that the claim, counterclaim, cross-claim or third-party complaint or defense of the opposing party was brought or maintained without reasonable ground or to harass the prevailing party. The court shall liberally construe the provisions of this paragraph in favor of awarding attorney's fees in all appropriate situations. It is the intent of the Legislature that the court award attorney's fees pursuant to this paragraph and impose sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all appropriate situations to punish for and deter frivolous or vexatious claims and defenses because such claims and defenses overburden limited judicial resources, hinder the timely resolution of meritorious claims and increase the costs of engaging in business and providing professional services to the public.

In awarding attorney's fees, the court may pronounce its decision on the fees at the conclusion of the trial or special proceeding without written motion

and with or without presentation of additional evidence.

Subsections 2 and 3 do not apply to any action arising out of a written instrument or agreement which entitles the prevailing party to an award of reasonable attorney's fees.

NRS 18.010 [emphasis added].

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# NRS 18.100 states in relevant part that -

1. The party in whose favor judgment is rendered, and who claims costs, must file with the clerk, and serve a copy upon the adverse party, within 5 days after the entry of judgment, or such further time as the court or judge may grant, a memorandum of the items of the costs in the action or proceeding, which memorandum must be verified by the oath of the party, or the party's attorney or agent, or by the clerk of the party's attorney, stating that to the best of his or her knowledge and belief the items are correct, and that the costs have been necessarily incurred in the action or proceeding.

2. The party in whose favor judgment is rendered shall be entitled to recover the witness fees, although at the time the party may not actually have paid them. Issuance or service of subpoena shall not be necessary to entitle a prevailing party to tax, as costs, witness fees and mileage, provided that such

witnesses be sworn and testify in the cause.

3. It shall not be necessary to embody in the memorandum the fees of the clerk, but the clerk shall add the same according to the fees of the clerk fixed by statute.

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In the instant matter, Bonnie is the prevailing party. Therefore, she should be awarded her attorney's fees and costs.

Moreover, the Eighth Judicial District Rules are also a basis for an award of fees and a fine (a penalty above the amount of reasonable attorneys and costs) based upon Bart's breach of the Court's Decree. EDCR 7.60 states -

- (a) If without just excuse or because of failure to give reasonable attention to the matter, no appearance is made on behalf of a party on the call of a calendar, at the time set for the hearing of any matter, at a pre-trial conference, or on the date of trial, the court may order any one or more of the following:
  - (1) Payment by the delinquent attorney or party of costs, in such amount as the court may fix, to the clerk or to the adverse party.
  - (2) Payment by the delinquent attorney or party of the reasonable expenses, including attorney's fees, to any aggrieved party.
  - (3) Dismissal of the complaint, cross-claim, counter-claim or motion or the striking of the answer and entry of judgment by default, or the granting of the motion.
  - (4) Any other action it deems appropriate, including, without limitation, imposition of fines.
  - (b) The court may, after notice and an opportunity to be heard, impose upon an attorney or a party any and all sanctions which may, under the facts of the case, be reasonable, including the imposition of fines, costs or attorney's fees when an attorney or a party without just cause:
    - (1) Presents to the court a motion or an opposition to a motion which is obviously frivolous, unnecessary or unwarranted.
    - (2) Fails to prepare for a presentation.
    - (3) So multiplies the proceedings in a case as to increase costs unreasonably and vexatiously.
    - (4) Fails or refuses to comply with these rules.
    - (5) Fails or refuses to comply with any order of a judge of the court.

[Emphasis added.] Here, Bart did not appear for the Evidentiary Hearing. Thus, he failed to prepare for the presentation. He also failed to cooperate in the proceeding. Bonnie was forced to serve seven subpoenas as follows: Wells Fargo, JP Morgan Chase, First Republic Bank, Wynn Las Vegas, Southern Glazer's Wine and Spirits, Golden Entertainment, and Resorts World Las Vegas.

EDCR 7.60 also allows an order for attorney's fees when a party multiplies the proceedings or "Fails or refuses to comply with any order of a judge of the court." EDCR 7.60(b)(5).

Here, Bart refused to comply with the parties' Stipulated Decree requiring that he pay child support, alimony, attorney fees, and health insurance to Bonnie. Bonnie attempted to resolve these issues with Bart, but he refused

NRS 125.150 pertaining to an award for attorney's fees, states in relevant part,

3. Except as otherwise provided in NRS 125.141, whether or not application for suit money has been made under the provisions of NRS 125.040, the court may award a *reasonable attorney's fee* to either party to an action for divorce if those fees are in issue under the pleadings.

[Emphasis added]

In Miller v. Wilfong, 121 Nev. 619, 621, 119 P.3d 727, 730 (2005), the Court stated:

[I]t is within the trial court's discretion to determine the reasonable amount of attorney fees under a statute or rule, in exercising that discretion, the court must evaluate the factors set forth in *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969). Under *Brunzell*, when courts determine the appropriate fee to award in civil cases, they must consider various factors, including the qualities of the advocate, the character and difficulty of the work performed, the work actually performed by the attorney, and the result obtained. We take this opportunity to clarify our jurisprudence in family law cases to require trial courts to evaluate

the Brunzell factors when deciding attorney fee awards. Additionally, in Wright v. Osburn, this court stated that family law trial courts must also consider the disparity in income of the parties when awarding fees. Therefore, parties seeking attorney fees in family law cases must support their fee request with affidavits or other evidence that meets the factors in Brunzell and Wright.

Miller v. Wilfong, 121 Nev. 619, 623-24, 119 P.3d 727, 730 (2005).

Bonnie seeks reimbursement of his attorney's fees and costs in this matter and as the prevailing party under the criteria set forth in *Miller v. Wilfong*, 121 Nev. 619, 119 P.3d 727 (2005).

With regard to fees, the Supreme Court has adopted "well known basic elements," which in addition to hourly time schedules kept by the attorney, are to be considered in determining the reasonable value of an attorney's services qualities, commonly referred to as the *Brunzell* factors.<sup>1</sup>

1. Quality of the Advocate: his ability, his training, education, experience, professional standing and skill. This factor logically addresses the rate at which counsel charges for services. A skilled and experienced attorney can justify an hourly rate greater than an attorney with less skill and experience. A party may contend that a rate is either reasonable or excessive in the market based upon the education, skill and experience of an attorney, or lack thereof.

Radford J. Smith, Chartered, is A/V rated firm. The attorneys have litigated almost every aspect of Nevada family law during the course of their respective careers. Its senior

<sup>&</sup>lt;sup>1</sup> Brunzell v. Golden Gate National Bank, 85 Nev. 345, 455 P.2d 31, 33 (1969).

attorney, and the lead attorney in the present case, Kimberly A. Stutzman, Esq. (formerly Kimberly A. Medina, KAM on the Bill History) is a graduate of the Golden Gate University School of Law. She received a Specialization Certificate in Family Law and Intellectual Property upon graduation. She exclusively practices family law in the four years that she has been licensed in Nevada. She is also licensed in the state of California. Her rate of \$300 per hour is reasonable based on her qualifications, experience, and quality of work performed in this matter.

- importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation. The "character of the work" goes to whether the fee charged was commensurate to the "difficulty, intricacy and importance" of the issues raised. Bonnie incurred the fees addressed above due to Bart's actions and his failure to comply with basic court orders as well as the parties' stipulated Decree of Divorce. Bonnie's counsel worked diligently to prosecute her Motion, reviews thousands of pages of Bart's financial records that had to be subpoenaed, and seek Bart's compliance in this case.
  - 3. The Work Actually Performed by the Lawyer the skill, time and attention given to the work. Bonnie's counsel submits that the work done in this case was performed in a competent and professional matter. The fees incurred were necessary, reasonable, and commensurate to the work performed. Bonnie submits her Billing History with his Memorandum of Fees and Costs.

4. The Result: Whether the attorney was successful and what benefits were derived.

Based on the foregoing, Bonnie was successful in the prosecution of her Motion. Thus, she will be the prevailing party, and the Court granted Bonnie's request for costs in the amount of \$1,339.80 and attorney's fees in the amount of \$24,185.00 for a total of \$25,524.80.

#### III.

#### **CONCLUSION**

Based on the foregoing, Bonnie requests that the Court grant judgment in favor of Bonnie and against Bart for any and all attorney's fees and costs incurred by Bonnie in this matter.

DATED this 31 December 2020.

RADFORD J. SMITH, CHARTERED

/s/ Kimberly A. Stutzman
KIMBERLY A. STUTZMAN, ESQ.
Nevada Bar No. 014085
2470 St. Rose Parkway, Suite 206
Henderson, Nevada 89074
Attorneys for Defendant

# LY A. STUTZMAN, ESO.

	CIVIODNI DECLADATION OF KIMPEDI VA STUTZMAN ESO.
1	SWORN DECLARATION OF KIMBERLY A. STUTZMAN, ESQ.
2	STATE OF NEVADA )
3 4	COUNTY OF CLARK )
5	KIMBERLY A. STUTZMAN, ESQ., declares as follows:
6	1. I have personal knowledge of the facts contained herein, and I am competent
8	to testify thereto.
9	2. I am an attorney duly licensed to practice law in all courts in the State of
10 11	Nevada. My firm, Radford J. Smith, Chartered, is counsel for Defendant, Bonnie Mahoney
12	in this action.
13 14	3. I have prepared and reviewed the foregoing Memorandum of Attorney's Fees
14	The facts contained therein are true and correct, and within my personal knowledge.

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The parties, Defendant, BONNIE MAHONEY ("Bonnie"), age 49, and 4. Plaintiff, BARTHOLOMEW MAHONEY ("Bart"), age 54 were divorced by stipulated Decree of Divorce ("Decree") filed February 3, 2016.

The parties have two minor children, BRIGITTE MAHONEY ("Brigitte"), 5. born October 29, 2001 (age 19), and SOPHIA MAHONEY ("Sophia"), born June 12, 2004 (age 16).

At the December 3, 2020 Evidentiary Hearing, the Court granted Bonnie's Motions. The Court further ordered that it was inclined to grant most of the attorney's fees and costs for preparation of the hearing. As a result, Bonnie submits this Memorandum of Fees and Costs. She requests that the Court enter an order directing Bart to pay all of

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- 7. As discussed above, Bart has multiplied these proceedings and as a result, Bonnie has incurred attorney's fees and costs in the prosecution of this Motion. A request for an order directing another party to pay attorney's fees must be based upon statute, rule or contractual provision. See, e.g, Rowland v. Lepire, 99 Nev. 308, 662 P.2d 1332 (1983). Here, there is a statutory mandate for an award of fees against a party shown to be in arrearages in child support (NRS 125B.140).
  - 8. NRS 18.010 states in relevant part –

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- 1. The compensation of an attorney and counselor for his or her services is governed by agreement, express or implied, which is not restrained by law.
- 2. In addition to the cases where an allowance is authorized by specific statute, the court may make an allowance of attorney's fees to a prevailing party:
  - (a) When the prevailing party has not recovered more than \$20,000; or (b) Without regard to the recovery sought, when the court finds that the claim, counterclaim, cross-claim or third-party complaint or defense of the opposing party was brought or maintained without reasonable ground or to harass the prevailing party. The court shall liberally construe the provisions of this paragraph in favor of awarding attorney's fees in all appropriate situations. It is the intent of the Legislature that the court award attorney's fees pursuant to this paragraph and impose sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all appropriate situations to punish for and deter frivolous or vexatious claims and defenses because such claims and defenses overburden limited judicial resources, hinder the timely resolution of meritorious claims and increase the costs of engaging in business and providing professional services to the public.
  - 3. In awarding attorney's fees, the court may pronounce its decision on the fees at the conclusion of the trial or special proceeding without written motion and with or without presentation of additional evidence.

4. Subsections 2 and 3 do not apply to any action arising out of a written instrument or agreement which entitles the prevailing party to an award of reasonable attorney's fees.

NRS 18.010 [emphasis added].

- 9. NRS 18.100 states in relevant part that -
- 1. The party in whose favor judgment is rendered, and who claims costs, must file with the clerk, and serve a copy upon the adverse party, within 5 days after the entry of judgment, or such further time as the court or judge may grant, a memorandum of the items of the costs in the action or proceeding, which memorandum must be verified by the oath of the party, or the party's attorney or agent, or by the clerk of the party's attorney, stating that to the best of his or her knowledge and belief the items are correct, and that the costs have been necessarily incurred in the action or proceeding.
- 2. The party in whose favor judgment is rendered shall be entitled to recover the witness fees, although at the time the party may not actually have paid them. Issuance or service of subpoena shall not be necessary to entitle a prevailing party to tax, as costs, witness fees and mileage, provided that such witnesses be sworn and testify in the cause.
- 3. It shall not be necessary to embody in the memorandum the fees of the clerk, but the clerk shall add the same according to the fees of the clerk fixed by statute.
- 4. Within 3 days after service of a copy of the memorandum, the adverse party may move the court, upon 2 days' notice, to retax and settle the costs, notice of which motion shall be filed and served on the prevailing party claiming costs. Upon the hearing of the motion the court or judge shall settle the costs.
- 10. In the instant matter, Bonnie is the prevailing party. Therefore, she should be awarded her attorney's fees and costs.
- 11. Moreover, the Eighth Judicial District Rules are also a basis for an award of fees and a fine (a penalty above the amount of reasonable attorneys and costs) based upon Bart's breach of the Court's Decree. EDCR 7.60 states
  - (a) If without just excuse or because of failure to give reasonable attention to the matter, no appearance is made on behalf of a party on the call of a calendar,

at the time set for the hearing of any matter, at a pre-trial conference, or on the date of trial, the court may order any one or more of the following:

(1) Payment by the delinquent attorney or party of costs, in such amount as the court may fix, to the clerk or to the adverse party.

(2) Payment by the delinquent attorney or party of the reasonable expenses, including attorney's fees, to any aggrieved party.

(3) Dismissal of the complaint, cross-claim, counter-claim or motion or the striking of the answer and entry of judgment by default, or the granting of the motion.

(4) Any other action it deems appropriate, including, without limitation, imposition of fines.

(b) The court may, after notice and an opportunity to be heard, impose upon an attorney or a party any and all sanctions which may, under the facts of the case, be reasonable, including the imposition of fines, costs or attorney's fees when an attorney or a party without just cause:

(1) Presents to the court a motion or an opposition to a motion which is obviously frivolous, unnecessary or unwarranted.

(2) Fails to prepare for a presentation.

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(3) So multiplies the proceedings in a case as to increase costs unreasonably and vexatiously.

(4) Fails or refuses to comply with these rules.

(5) Fails or refuses to comply with any order of a judge of the court.

[Emphasis added.] Here, Bart did not appear for the Evidentiary Hearing. Thus, he failed to prepare for the presentation. He also failed to cooperate in the proceeding. Bonnie was forced to serve seven subpoenas as follows: Wells Fargo, JP Morgan Chase, First Republic Bank, Wynn Las Vegas, Southern Glazer's Wine and Spirits, Golden Entertainment, and Resorts World Las Vegas.

- EDCR 7.60 also allows an order for attorney's fees when a party multiplies 12. the proceedings or "Fails or refuses to comply with any order of a judge of the court." EDCR 7.60(b)(5).
  - Here, Bart refused to comply with the parties' Stipulated Decree requiring that 13.

- 14. NRS 125.150 pertaining to an award for attorney's fees, states in relevant part,
- 3. Except as otherwise provided in <u>NRS 125.141</u>, whether or not application for suit money has been made under the provisions of <u>NRS 125.040</u>, the court may award a *reasonable attorney's fee* to either party to an action for divorce if those fees are in issue under the pleadings.

  [Emphasis added]
- 15. In *Miller v. Wilfong*, 121 Nev. 619, 621, 119 P.3d 727, 730 (2005), the Court stated:

[I]t is within the trial court's discretion to determine the reasonable amount of attorney fees under a statute or rule, in exercising that discretion, the court must evaluate the factors set forth in *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969). Under *Brunzell*, when courts determine the appropriate fee to award in civil cases, they must consider various factors, including the qualities of the advocate, the character and difficulty of the work performed, the work actually performed by the attorney, and the result obtained. We take this opportunity to clarify our jurisprudence in family law cases to require trial courts to evaluate the *Brunzell* factors when deciding attorney fee awards. Additionally, in *Wright v. Osburn*, this court stated that family law trial courts must also consider the disparity in income of the parties when awarding fees. Therefore, parties seeking attorney fees in family law cases must support their fee request with affidavits or other evidence that meets the factors in *Brunzell* and *Wright*.

Miller v. Wilfong, 121 Nev. 619, 623-24, 119 P.3d 727, 730 (2005).

- 16. Bonnie seeks reimbursement of his attorney's fees and costs in this matter and as the prevailing party under the criteria set forth in *Miller v. Wilfong*, 121 Nev. 619, 119 P.3d 727 (2005).
  - 17. With regard to fees, the Supreme Court has adopted "well known basic

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elements," which in addition to hourly time schedules kept by the attorney, are to be considered in determining the reasonable value of an attorney's services qualities, commonly referred to as the *Brunzell* factors.<sup>2</sup>

- Quality of the Advocate: his ability, his training, education, experience, 1. professional standing and skill. This factor logically addresses the rate at which counsel charges for services. A skilled and experienced attorney can justify an hourly rate greater than an attorney with less skill and experience. A party may contend that a rate is either reasonable or excessive in the market based upon the education, skill and experience of an attorney, or lack thereof. Radford J. Smith, Chartered, is A/V rated firm. The attorneys have litigated almost every aspect of Nevada family law during the course of their respective careers. Its senior attorney, and the lead attorney in the present case, Kimberly A. Stutzman, Esq. (formerly Kimberly A. Medina, KAM on the Bill History) is a graduate of the Golden Gate University School of Law. She received a Specialization Certificate in Family Law and Intellectual Property upon graduation. She exclusively practices family law in the four years that she has been licensed in Nevada. She is also licensed in the state of California. Her rate of \$300 per hour is reasonable based on her qualifications, experience, and quality of work performed in this matter.
  - 2. The Character of the Work to be Done its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and

<sup>&</sup>lt;sup>2</sup> Brunzell v. Golden Gate National Bank, 85 Nev. 345, 455 P.2d 31, 33 (1969).

- 3. The Work Actually Performed by the Lawyer the skill, time and attention given to the work. Bonnie's counsel submits that the work done in this case was performed in a competent and professional matter. The fees incurred were necessary, reasonable, and commensurate to the work performed. Bonnie submits her Billing History with his Memorandum of Fees and Costs.
- 4. The Result: Whether the attorney was successful and what benefits were derived. Based on the foregoing, Bonnie was successful in the prosecution of her Motion. Thus, she will be the prevailing party, and the Court granted Bonnie's request for costs in the amount of \$1,339.80 and attorney's fees in the amount of \$24,185.00 for a total of \$25,524.80.
- 18. Pursuant to NRS 53.045, I declare under penalty of perjury that the foregoing is true and correct.

/s/ Kimberly A. Stutzman
KIMBERLY A. STUTZMAN, ESQ.

#### CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Radford J. Smith Chartered ("the Firm"). I am over the age of 18 and not a party to the within action. I served the foregoing document described as DEFENDANT'S MEMORANDUM OF FEES, COSTS AND DISBURSEMENTS AND BRUNZELL DECLARATION on this 31 December 2020 to all interested parties via the electronic service through the Eighth Judicial District Court's electronic filing system (pursuant to Administrative Order 20-17):

Bart Mahoney
<a href="mailto:bmmlv27@gmail.com">bmmlv27@gmail.com</a>
<a href="mailto:plaintiff">Plaintiff</a>

/s/ Kimberly A. Stutzman

An Employee of Radford J. Smith, Chartered

# EXHIBIT "A"

AA000472

#### Radford J. Smith, Chartered 2470 St. Rose Parkway#206 Henderson, Nevada 89074

# **History Bill**

Date	Staff	T/E	Description	Dur/Qty	Amount
Bonnie Maho		11,5	Client No.		
Mahoney ad			Matter No. D-13-477883-D	1	\$250.00
11/20/2017	KAM	T	Conference with client.	0.2	\$50.00
11/21/2017	KAM	T _	Review Register of Actions.	0.2	\$50.00
12/19/2017	KAM	T	Email exchange with client (x2).	0,1	\$25.00
12/27/2017	KAM	T	Email to client.	0.3	\$75.00
1/03/2018	KAM	T	Review client emails and documents (x2). Email to client.	0.2	\$50.00
1/26/2018	KAM	T -	Review emails from client (x2).	0.3	\$75.00
1/30/2018	KAM	T	Email exchange with client (x3).	0.5	\$125.00
1/30/2018	KAM	T	Phone call with client.	1	\$250.00
1/30/2018	KAM	T	Review, revise Financial Disclosure Form and Schedule of Arrears.	·	·
2/09/2018	KAM	T	Review client emails and documents (x14).	0.5	\$125.00
3/13/2018	KAM	T	Prepare Motion to Reduce Child Support to Judgment, schedule of arrears, and revise spreadsheet. Email to client.	1.6	\$400.00
5/18/2018	KAM	T	Email exchange with client (x2).	0.2	\$50.00
6/11/2018	KAM	Т	Phone call with client.	8.0	\$200.00
2/06/2019	KAM	Т	Email exchange withclient (x4).	0.4	\$100.00
2/12/2019	KAM	T	Email exchange with client (x3).	0.3	\$75.00
2/25/2019	KAM	Т	Email exchange with client (x2).	0.2	\$50.00
2/26/2019	DD	Τ	Prepare Initial Draft of Defendant's Financial Disclosure Form for Attorney Review; prepare Chase and Zelle payment images into file for production.	0.7	\$105.00
3/28/2019	KAM	Т	Revise Motion. Email to client. Revise Arrears spreadsheet.	2	\$500.00
3/29/2019	KAM	Т	Conduct legal research.	0.5	\$125.00
4/22/2019	KAS	T	Revise Motion. Revise Schedule of Arrears. Conduct Internet research re: VP Salaries. Email to client.	1.5	\$375.00
4/26/2019	KAS	Т	Revise Arrears spreadsheet. Revise Motion. Review Exhibits.	0.2	\$50.00
5/03/2019	JH	Т	Receive text messages between parties, upload and save to matter.	0.5	\$75.00
5/03/2019	KAS	т	Prepare draft Declaration of client.	0.2	\$50.00
5/03/2019	KAS	Т	Revise, finalize Motion. Email to client.	0.3	\$75.00
5/06/2019	KAS	Т	Email to client.	0.2	\$50.00
5/07/2019	SAH	T	Preparation of Certificate of Service of Financial Disclosure Form	0.2	\$30.00
5/09/2019	JH	Т	Preparation of Certificate of Service for Motion, Schedule of Arrearages, FDF & Notice Hearing.	0.3	\$45.00
5/09/2019	JH	Т	Submit Financial Disclosure Form for filing, receive file stamped copy, update file and email client.	0.3	\$45.00

#### Radford J. Smith, Chartered 2470 St. Rose Parkway#206 Henderson, Nevada 89074

## **History Bill**

Date	Staff	T/F	Description	Dur/Qty	Amount
5/09/2019	JH	T	Receipt of Notice of Hearing, calendar, update file and email client.	0.2	\$30.00
5/09/2019	JH	T	Submit Certificate of Service for filing, receive file stamped copy, update file and email client.	0.3	\$45.00
5/09/2019	JH	T	Submit Motion to Reduce Arrearages for filing, receive file stamped copy, update file and email client.	0.3	\$45.00
5/09/2019	JH	T	Submit Schedule of Arrears for filing, receive file stamped copy, update file and email client.	0.3	\$45.00
5/09/2019	KAS	T	Prepare, finalize, Appendix of Exhibits.	0.4	\$100.00
5/09/2019	JH	T	Submit Exhibits to Motion for filing, receive file stamped copy, update file and email client.	0.3	\$45.00
5/10/2019	SAH	Т	Telephone conference with Debbie Rose at clerk's office regarding receipt of Request for Fees	0.1	\$15.00
5/28/2019	KAS	Т	Email to client.	0.1	\$25.00
5/29/2019	KAS	Т	Email exchanges with client (x4).	0.4	\$250.00
5/30/2019	KAS	Т	Prepare, finalize Ex Parte Request to Continue Hearing (re: Service) and Order Granting Request.	0.5	\$125.00
5/30/2019	SAH	Т	Submission of Ex Parte Request for Order to Continue Hearing to Court for e-filing; Update client file; Forward to client	0.1	\$15.00
5/30/2019	KAS	Т	Email exchange with client (x2).	0.2	\$50.00
6/05/2019	SAH	T	Telephone conference with Natalie in Dept. S regarding status of Order Granting Ex Parte Request to Continue Hearing	0.1	\$15.00
6/06/2019	SAH	Т	Receipt of Notice of Rescheduling Hearing; Update client file; Forward to client; Preparation of Certificate of Service of Notice of Rescheduling Hearing	0.3	\$45.00
6/07/2019	SAH	T	Receipt of Order Granting Ex Parte Request to Continue Hearing; Preparation of Notice of Entry of Order Granting Ex Parte Request to Continue Hearing; Submission of same to Court for e-filing; Update client file; Forward to client	0.3	\$45.00
6/24/2019	SAH	T	Receipt and review of email from client regarding service on opposing party; Email to Richard at Report to Court regarding charge for skip trace	0.2	\$30.00
6/25/2019	SAH	Т	Telephone conference with client regarding service on Plaintiff; Receipt of email from client confirming her request or a Skip Trace; Email to Richard at Report to Court requesting Skip Trace; Preparation of Certificate of Service of all filed documents to send to Plaintiff via Certified Mail - Return Receipt Requested	0.6	\$90.00
6/25/2019	KAS	Т	Email to client.	0.1	\$25.00
7/23/2019	KAS	T	Prepare Request for Submission and Order Granting Motion. Email to client.	8.0	\$200.00
7/24/2019	JH	Т	Preparation of Certificate of Service for Request for Submission of Motion	0.3	\$45.00

#### Radford J. Smith, Chartered 2470 St. Rose Parkway#206 Henderson, Nevada 89074

## **History Bill**

Date	Staff	T/E	Description	Dur/Qty	Amount
7/24/2019				0.0	<u> </u>
7/24/2019	KAS	Т	Email exchanges with client (x3). Finalize Request and Order Granting Motion.	0.3	\$75.00
8/12/2019	CJ	T	Call to Department S law clerk following up on Request for Submission regarding unopposed motion. Law clerk advises that the Judge will review the submission today or tomorrow.	0	\$0.00
8/19/2019	KAS	T	Review letter from A. Grigsby. Prepare letter re Continuance. Email to client.	0.4	\$120.00
8/19/2019	CJ	Т	Receive letter from Aaron Grigsby, Esq. requesting continuance of the hearing. Receive Notice of Appearance Counsel. Update client file and email the same to client. Call to Court following up regarding status of Request for Submission of Order on unopposed motion. Judicial Executive Assistant advises that the Law Clerk is sick, but she will leave the order for her review. Transmit letter to Mr. Grigsby via email, send client copy of the same via email.	0	\$0.00
8/20/2019	CJ	Т	Call from Court advising that Request for Submission is being denied. The hearing on August 22, 2019 will proceed as scheduled.	0	\$0.00
8/21/2019	JH	Τ	Receipt of Opposition to Motion to Reduce Arrearages and Modify Alimony, update file and email to client.	0	\$0.00
8/22/2019	KAS	Т	Prepare for and attend hearing, includes travel and wait time.	2	\$600.00
8/26/2019	KAS	Т	Conduct additional legal research re: Brief to Modify Alimony.	0.8	\$240.00
8/29/2019	CJ	Т	Tansmit letter to Opposing Counsel, calendar relevant deadline for response, email client copy of the same.	0	\$0.00
8/29/2019	KAS	Т	Email to client.	0.1	\$30.00
8/29/2019	CJ	Т	Prepare initial draft of Order from August 22, 2019 hearing.	0.4	\$60.00
8/29/2019	KAS	T	Review, revise Order After August 22, 2019 Hearing. Prepare, finalize letter to A. Grigsby.	0.5	\$150.00
9/05/2019	KAS	Т	Email exchanges with client (x2). Email to A. Grigsby.	0.2	\$60.00
9/06/2019	KAS	T	Email exchanges with A. Grigsby (x2).	0.2	\$60.00
9/06/2019	KAS	Т	Email exchanges with client (x5).	0.5	\$150.00
9/06/2019	CJ	Т	Intake and organize bank statements provided by client. Review email correspondence between client, opposing counsel, and associate regarding short and long term case plan.	0	\$0.00
9/09/2019	KAS	Т	Prepare letter to Judge Ochoa re August 22, 2019 Hearing.	0.1	\$30.00
9/10/2019	KAS	Т	Finalize Letter to Judge Ochoa re: August 22, 2019 Order.	0.1	\$30.00
9/10/2019	Cl	T	Send courtesy copy of correspondence to the Court (submitting the Order from the August hearing absent countersignature) to Opposing Counsel via the Court's Odyssey system. Intake and process "serve" stamped document, email client copy of the same.	0	\$0.00

			D	Dur/Qty	Amount
	Staff KAS	T/E T	Conduct legal research re: Contract vs Statute interpreting Stipulated Divorce, and review Barrameda v. Barrameda and Bluestein v. Bluestein cases.	0.1	\$30.00
9/17/2019	CJ	Т	Prepare and file Order After August Hearing; update client file; email copy to client. Prepare Notice of Entry of Order.	0.3	\$45.00
9/18/2019	CJ	Т	eFile and eServe Notice of Entry of Order; update client file; email to client.	0	\$0.00
9/25/2019	KAS	Т	Email exchanges with client (x2).	0.2	\$60.00
9/25/2019	CJ	T	Email client current Financial Disclosure Form and last filed Financial Disclosure Form so that she may prepare updated form for filing.	0	\$0.00
9/30/2019	KAS	Т	Review Opposition. Review legal research notes. Review client emails, evidence. Prepare Reply in Support of Motion. Revise Updated Arrears and excel calculation. Email to client.	2.3	\$690.00
10/03/2019	KAS	Т	Email to client.	0.1	\$30.00
10/03/2019	KAS	· T	Email exchanges with client (x2). Revise, finalize Reply.	0.3	\$90,00
10/04/2019	CJ	Ť	eFile and eServe Reply; update client file; email to client with reminder regarding hearing.	0	\$0.00
10/08/2019	CJ	Т	eFile and eServe Schedule of Arrears; update client file, email to client. Intake and save draft FDF from client.	0	\$0.00
10/09/2019	KAS	Т	Email to client.	0	\$0.00
10/03/2019	KAS	T	Review letter from A. Grigsby.	0.1	\$30.00
10/14/2019	KAS	T	Email to A. Grigsby.	0.1	\$30.00
10/14/2019	KAS	T	Email exchanges with client (x4).	0.2	\$60.00
10/24/2019	CJ	T	Prepare Initial Post Decree Disclosure of Witnesses and Documents Pursuant to NRCP 16.2 including organizing documents for use as evident in the matter and redacting sensitive information.	1.1	\$165.00
10/28/2019	KAS	Т	Review, revise Initial Disclosure Post Decree.	0.1	\$30.00
10/28/2019		Т	Bates stamp documents and update pleading accordingly.  Prepare disc containing document files for service via US Mail.	0.5	\$75.00
10/30/2019	CJ	Т	Call to client, leave voicemail requesting update on whether client intends to appear for November 13, 2019 hearing in person or via telephone. Review and respond to client's emails about attending the hearing. Provide location information for the Court.	0	\$0.00
11/06/2019	) CJ	Т		0.3	\$45.0
4 4 14 0 10 0 4 0	) CJ	7	"	0	\$0.0
11/12/2019 11/13/2019		! 7	the same including conference with A.	1.9	\$570.0

Dete	Staff	T/E	Description	Dur/Qty	Amount
Date 11/14/2019	SAH	<u></u>	Preparation of client's Financial Disclosure Form	0.5	\$75.00
11/14/2019	SAH	T	Email to Transcript Services requesting video and Court Minutes from the November 13, 2019 hearing; Receipt of hearing video from November 13, 2019 hearing; Update client file	0	\$0.00
11/14/2019	CJ	Т	Partial review of video transcript of 11/13/19 hearing, calendar deadlines set at hearing.	0.3	\$45.00
11/15/2019	SAH	Т	Email to client transmitting draft Financial Disclosure Form	0	\$0.00
11/18/2019	SAH	Т	Receipt of Court Minutes from the November 13, 2019 hearing; Update client file; Forward to client	0	\$0.00
11/22/2019	KAS	Т	Prepare Order and Letter to A. Grigsby with November 13, 2019 Order.	0.5	\$150.00
11/26/2019	SAH	Т	Receipt of seven (7) emails (including some attachments); Update client file	0	\$0.00
12/04/2019	KAS	Т	Revise, finalize Order After Hearing, letter to Judge Ochoa, and letter to A. Grigsby.	0.8	\$240.00
12/13/2019	CJ	т	Review correspondence and FDF served by Opposing Counsel.	0	\$0.00
12/13/2019	KAS	Т	Review Defendant's FDF and letter from A. Grigsby with list of financial institutions.	0.2	\$60.00
12/13/2019	KAS	Т	Review, finalize Notice of Entry of Order After 11-13-19 Hearing.	0	\$0.00
12/13/2019	SAH	Т	Submission of Order After November 13, 2019 hearing to Court for e-filing; Preparation of Notice of Entry of Order After November 13, 2019 Hearing for attorney's review; Submission of Notice of Entry to Court for e-filing; Receipt of Plaintiff's Financial Disclosure Form; Forward copies to client; Update client file	0	\$0.00
12/16/2019	Cl	Т	Review and respond to client's email, prepare updated FDF for client to finish with new information.	0.2	\$30.00
12/16/2019	KAS	Т	Review Email from client (dated 12/13, and respond.	0.2	\$60.00
12/18/2019	KAS	T	Review email from client.	0.1	\$30.00
12/27/2019	KAS	Т	Prepare subpoenas and conduct Internet research re Secretary of State for KRM Inc (CA Based company with Venetian Hotel Restaurants.)		\$90.00
12/30/2019	CJ	Т	eServe Notice of Intent to Serve Subpoenas and email to client. Calendar related deadlines.	0.2	\$30.00
12/30/2019	KAS	Т	Conduct Internet, Secretary of State research re; Nevada corporations for Plaintiff's employment and banking records. Continue research re: California company, KRM, Inc. Prepare notice of depositions, subpoenas for employment/bank records, and prepare notice of intent to serve (x7 subpoenas).	2.2	\$660.00
12/30/2019	CĴ	Т	- U code and the KDM inc. for purposes of	0.4	\$60.00
1/14/2020	CJ	Т	4. 4.7 when a partial records of Plaintiff	0	\$0.00

Date	Staff	T/E	Description	Dur/Qty	Amount
1/14/2020 1/16/2020	CJ	Т	Call from Wells Fargo Bank regarding Subpoena.	0.2	\$30.00
1/17/2020	CJ	T	Call to Wells Fargo Bank regarding Subpoena Duces Tecum, leave message granting extension request through February 17, 2020.	0	\$0.00
1/17/2020	CJ	T	Review emails from June's regarding status of Service.	0	\$0.00
1/20/2020	KAS	Т	Email exchanges with J. Rogers at Southern Glazer's Wine and Spirits (x3).	0.1	\$30.00
1/23/2020	KAS	Т	Review documents received from Golden Entertainment responsive to our Subpoena Duces Tecum; update client file and prepare for disclosure of same.	0.1	\$30.00
1/28/2020	KAS	T	Review, finalize Amended Chase Subpoena.	0.1	\$30.00
1/28/2020	CJ	Т	Call to JP Morgan Chase in response to letter stating our Subpoena was improperly issued. Prepare Amended Subpoena to JP Morgan.	0	\$0.00
1/30/2020	KAS	T	Phone call with G. Gardner, Resorts World LV General Counsel.	0.1	\$30.00
1/31/2020	SAH	Т	Contact process server for service of Subpoena Duces Tecum on JP Morgan Chase; Prepare same for service	0	\$0.00
1/31/2020	Cl	Т	Call and email from First Republic Bank regarding response to the Subpoena. Update client file with documents received, email to client.	0.1	\$15.00
1/31/2020	KAS	T	Email exchanges with S. Smith at First Republic Bank.	0.5	\$150.00
2/04/2020	SAH	T	Preparation of Affidavit of Service of the Subpoena Duces Tecum addressed to JP Morgan Chase Bank; Submission of same to Court for e-filing; Update client file; Forward copy to client	0.3	\$45.00
2/12/2020	CJ	Т	Email to client noting that hearing was vacated.	0	\$0.00
2/13/2020	CJ	T	Update client file regarding subpoena response from Wells Fargo.	0	\$0.00
2/19/2020	KAS	Т	Begin review of Subpoena Response from Southern Glazier's Wine and Spirits, including their letter re Objections.	0.2	\$60.00
2/26/2020	SAH	Т	Review of Notice of Change of Law Firm Address; Update client file; Update opposing attorneys contact information	0	\$0.00
3/05/2020	SAH	Т	Two (2) telephone conferences with Chase Subpoena Processing Department regarding documents pursuant to Subpoena Duces Tecum and documents received on February 24, 2020	0.2	\$30,00
3/17/2020	CJ	T	Begin First Supplemental Disclosure.	0.5	\$75.00
3/19/2020	KAS	Т	Review client file, and email exchanges with client (x3) re trial, discovery, and FDF.	0.3	\$90.00
3/20/2020	KAS	Т	Email to client.	0.1	\$30.00

#### Radford J. Smith, Chartered 2470 St. Rose Parkway #206 Henderson, Nevada 89074

# **History Bill**

Date	Staff	T/E	Description	Dur/Qty	Amount
3/20/2020 3/23/2020	KAS	Τ	Review client files, evidence, and email exchanges with clients (x24). Review, finalize First Supplemental Disclosures. Email to A. Grigsby.	4.3	\$1,290.00
3/23/2020	CJ	T	Review records sent by client, email client regarding the same, update client file.	0.4	\$60.00
3/23/2020	KAS	Т	Review, revise client's Updated Financial Disclosure Form.	8.0	\$240.00
3/24/2020	KAS	Т	Review revisions from client, review client documents, evidence re income for FDF, revise, finalize FDF, and email exchanges with client (x14).	1	\$300.00
3/27/2020	KAS	Т	Prepare letter to client re: COVID-19 Court and Firm procedures and Maternity Leave. Email to client.	0	\$0.00
3/28/2020	KAS	Т	Email exchanges with client (x3).	0.1	\$30.00
3/30/2020	KAS	T	Begin review of Subpoenas and prepare spreadsheet.	0.5	\$150.00
3/31/2020	KAS	Т	Review Motion to Withdraw. Email exchanges with client (x2).	0.2	\$60.00
4/01/2020	KAS	Т	Email to A. Grigsby. Continue Review of Plaintiff's bank statements re arrears.	2.4	\$720.00
4/02/2020	KAS	Т	Continue review of subpoena re Alimony, Child Support Arrears. Update spreadsheet for trial exhibit.	4	\$1,200.00
4/03/2020	KAS	T	Complete review of client's bank statements from 2015 to present, Plaintiff's employment records re Bonuses, and prepare updated Arrears Spreadsheet re Child Support, Alimony, Attorney's Fees, and Bonuses for Trial. Emails toclient (x2).	6.6	\$1,980.00
4/06/2020	KAS	Т	Email exchanges with client (x9).	0.5	\$150.00
4/07/2020	KAS	Т	Email exchanges with A. Grigsby (x3).	0.1	\$30.00
4/16/2020	KAS	Т	Review client file, and email exchanges with client re Trial Preparation (x4).	0.2	\$60.00
4/24/2020	KAS	Т	Begin draft Pre-Trial Memorandum.	0.1	\$30.00
4/28/2020	CJ	Т	Review Notice of Entry of Order filed by Opposing Counsel.	0	\$0.00
4/28/2020	KAS	Т	Email exchanges with client (x3).	0.1	\$30.00
4/28/2020	Cl	Т	Call to Court JEA, leave message checking on status of Evidentiary Hearing, how it will be completed, and how Court would like trial exhibits submitted.	0	\$0.00
4/30/2020	KAS	Т	Email exchanges with client (x3). Email to Bart Mahoney (x1).	0	\$0.00
4/30/2020	KAS	Т	Review, revise Stipulation and Order.	0.1	\$30.00
4/30/2020	CJ	т	Prepare Stipulation and Order to Continue.	0.2	\$30.00
5/01/2020	KAS	Т	Email exchanges with Bart Mahoney (x3) re Stipulation and Order.	0.1	\$30.00
5/05/2020	KAS	Т	Email exchanges with client (x3).	0.2	\$60.00
5/05/2020	CJ	T	Review Stipulation and Order to Continue Evidentiary Hearing, update firm calendar, email to client.	0	\$0.00

Date	Staff	T/E	Description	Dur/Qty	Amount
5/05/2020 9/16/2020	CJ	Т	Review and respond to client email regarding status of Trial.  Calls to and from JEA regarding discrepancy between date on docket and date on SAO to Continue.	0.2	\$30.00
9/21/2020	CJ	Τ	Review Notice of Rescheduling from the Court, update client file, update firm calendar, email to client with brief explanation.	0.2	\$30.00
9/28/2020	CJ	Т	Prepare and file Certificate of Service regarding Notice of Hearing being mailed to Opposing Party. Email to client.	0.2	\$30.00
10/07/2020	CJ	T	Review Order Setting Evidentiary Hearing, update client file, calendar relevant deadlines, email to client.	0.3	\$45,00
11/23/2020	KAS	T	Review file and prepare Pre-Trial Memorandum. Revise Arrears spreadsheet.	2.5	\$750,00
11/24/2020	KAS	Т	Updated Schedule of Arrears for trial.	1.7	\$510.00
11/24/2020	CJ	T	Begin preparation of Trial Exhibits and Exhibit List.	1.5	\$225.00
11/25/2020	KAS	T	Conference with C. Janson. Review, finalize 2nd Supplemental Disclosure.	0.2	\$60.00
11/25/2020	KAS	Т	Phone call with client.	0.4	\$120.00
11/25/2020	KAS	Τ	Review, revise, and finalize Updated Financial Disclosure Form.	0.2	\$60.00
11/25/2020	CJ	Т	Prepare 2nd Supplement and updated Exhibit List.	0.5	\$75.00
11/30/2020	KAS	Т	Review documents from Wynn. Prepare for trial.	2.2	\$660.00
12/01/2020	KAS	Т	Prepare for Trial.	1	\$300.00
12/01/2020	CJ	Т	Update firm calendar with Blue Jeans information for Evidentiary Hearing.	0	\$0.00
12/02/2020	KAS	Т	Phone call and email exchanges with client. Prepare for trial.	5	\$1,500.00
12/03/2020	KAS	Т	Finish trial preparation, attend trial, and phone call with client. Revise Exhibit C, Support Arrears spreadsheet and email exchanges with Yvette in Department S.	4	\$1,200.00
12/11/2020	KAS	T	Email exchanges with client.	0	\$0.00
12/21/2020	KAS	Т	Prepare Findings and Order.	1.4	\$420.00
12/22/2020	KAS	Т	Continue preparing and finalize Findings and Order. Email to department.	4	\$1,200.00
12/28/2020	KAS	Ţ	Finalize Notice of Entry of Judgment and email exchanges with client.	0	\$0.00
			Subtotal	89.90	\$24,185.00
11/30/2017	ALL	Ε	Copy charge for 11/1/17 - 11/30/17, machine 1	187	\$46.75
11/30/2017	ALL	E	Copy charge for 11/1/17 - 11/30/17, machine 2	14	\$3.50
12/31/2017	ALL	Ε	Copy charge for 12/1/17 - 12/31/17, machine 1	10	\$2.50
1/31/2018	ALL	Е	Postage 1/1/18 - 1/31/18	0	\$0.67
2/28/2018	ALL	E	Copy charge for 2/1/18 - 2/28/18, machine 2	32	\$8.00

Date	Staff	T/E	Description	Dur/Qty	Amount
2/28/2018	ALL	Е	Copy charge for 2/1/18 - 2/28/18, machine 1	2	\$0.50
3/31/2018	ALL	Ε	Legal Research 3/1/18 - 3/31/18	0	\$4.01
6/30/2018	ALL	E	Legal Research 6/1/18 - 6/30/18	0	\$39.81
2/28/2019	ALL	Е	Copy charge for 2/28/19 - 2/28/19, machine 2	13	\$3.25
2/28/2019	ALL	E	Copy charge for 2/28/19 - 2/28/19, machine 1	28	\$7.00
3/31/2019	ALL	Ε	Copy charge for 3/1/19 - 3/31/19, machine 1	18	\$4.50
3/31/2019	ALL	Е	Legal Research 3/1/19 - 3/31/19	0	\$8.62
4/30/2019	ALL	Е	Copy charge for 4/1/19 - 4/30/19, machine 1	12	\$3.00
5/09/2019	ALL	Ε	Filing Fee 5/9/19	0	\$25.00
5/31/2019	ALL	Е	Copy charge for 5/1/19 - 5/31/19, machine 1	177	\$44.25
5/31/2019	ALL	E	Filing Fee 5/1/19 - 5/31/19	0	\$14.00
5/31/2019	ALL	E	Copy charge for 5/1/19 - 5/31/19, machine 2	185	\$46.25
5/31/2019	ALL	E	Postage 5/1/19 - 5/31/19	0	\$7.42
6/25/2019	ALL	E	Certified Mail	0	\$14.15
6/30/2019	ALL	Е	Copy charge for 6/1/19 - 6/30/19, machine 1	137	\$34.25
6/30/2019	ALL	Е	Copy charge for 6/1/19 - 6/30/19, machine 2	18	\$4.50
6/30/2019	ALL	Е	Filing Fee 6/1/19 - 6/30/19	0	\$14.00
7/31/2019	ALL	E	Copy charge for 7/1/19 - 7/31/19, machine 2	1	\$0.25
7/31/2019	ALL	Ε	Copy charge for 7/1/19 - 7/31/19, machine 1	55	\$13.75
7/31/2019	ALL	Е	Filing Fee 7/1/19 - 7/31/19	0	\$7.00
8/31/2019	ALL	Ε	Legal Research 8/1/19 - 8/31/19	0	\$27.70
8/31/2019	ALL	E	Copy charge for 8/1/19 - 8/31/19, machine 2	30	\$7.50
9/30/2019	ALL	Е	Filing Fee 9/1/19 - 9/30/19	0	\$7.00
9/30/2019	ALL	Ε	Legal Research 9/1/19 - 9/30/19	0	\$13.62
9/30/2019	ALL	Ε	Copy charge for 9/1/19 - 9/30/19, machine 1	19	\$4.75
10/31/2019	ALL.	Е	Postage 10/1/19 - 10/31/19	0	\$1.30
10/31/2019	ALL	E	Copy charge for 10/1/19 - 11/6/19, machine 1	41	\$10.25
11/30/2019	ALL	E	Postage 11/1/19 - 11/30/19	0	\$1.00
11/30/2019	ALL	E	Copy charge for 11/7/19 - 11/30/19, machine 2	22	\$5.50
11/30/2019	ALL	E	Copy charge for 11/7/19 - 11/30/19, machine 1	30	\$7.50
12/31/2019	ALL	E	Copy charge for 12/1/19 - 12/31/19 , machine 1	159	\$39.75
12/31/2019	ALL	E	Copy charge for 12/1/19 - 12/31/19 , machine 2	27	\$6.75
12/31/2019	ALL	E	Filing Fee 12/1/19 - 12/31/19	0	\$7.00
1/17/2020	ALL	E	Process Service of Southern Galzers Wine and Spirits	0	\$155.00
1/21/2020	ALL	E	Process Service of First Republic Bank	0	\$155.00
1/24/2020	ALL	E	Process Service of Wynn Las Vegas	0	\$108.00
1/28/2020	ALL	E	Process Service of Golden Entertainment	0	\$73.00

Date	Staff	T/E	Description		Dur/Qty	Amount
1/28/2020		-	Daniel Carlos (Well-East Dark		•	<b>#70.00</b>
1/28/2020	ALL	Ε	Process Service of Wells Fargo Bank		0	\$73.00
1/28/2020	ALL	Ε	Process Service of JP Morgan Chase		0	\$73.00
1/29/2020	ALL	Ε	Process Service of Resorts World Las Vegas		0	\$73.00
1/30/2020	ALL	Ε	Witness Fee for JP Morgan Chase		0	\$26.00
1/31/2020	ALL	E	Copy charge for 1/1/20 - 1/31/20 , machine 1		31	\$7.75
1/31/2020	ALL	Ε	Copy charge for 1/1/20 - 1/31/20 , machine 2		12	\$3.00
2/02/2020	ALL	E	Process Service of Chase Bank		0	\$40.00
2/29/2020	ALL	E	Copy charge for 2/1/20 - 2/29/20 , machine 1		6	\$1.50
2/29/2020	ALL	E	Copy charge for 2/1/20 - 2/29/20 , machine 2		6	\$1.50
2/29/2020	ALL	Ε	Filing Fee 2/1/20 - 2/29/20		0	\$3.50
3/31/2020	ALL	Ε	Filing Fee 3/1/20 - 3/31/20		0	\$3.50
9/30/2020	ALL	Ε	Filing Fee 9/1/20 - 9/30/20		0	\$7.00
9/30/2020	ALL	E	Copy charge for 9/1/20 - 9/30/20 , machine 1		6	\$1.50
11/30/2020	ALL	Ε	Filing Fee 11/1/20 - 11/30/20		0	\$21.00
11/30/2020	ALL	Ε	Copy charge for 11/1/20 - 11/30/20 , machine 1		68	\$17.00
				Subtotal	1,346.00	\$1,339.80
				Total	1,435.90	\$25,524.80
Total Time and Expenses			1,435.90	\$25,524.80		