

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

2
3 ESTATE OF REBECCA POWELL, through
4 BRIAN POWELL, as Special Administrator;
5 DARCI CREECY, individually and as Heir;
6 TARYN CREECY, individually and as an
7 Heir; ISAAH KHOSROF, individually and as
8 an Heir; LLOYD CREECY, individually;,
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14 Plaintiffs,

15 vs.

16 VALLEY HEALTH SYSTEM, LLC (doing
17 business as “Centennial Hills Hospital Medical
18 Center”), a foreign limited liability company;
19 UNIVERSAL HEALTH SERVICES, INC., a
20 foreign corporation; DR. DIONICE S.
21 JULIANO, M.D., an individual; DR.
22 CONRADO C.D. CONCIO, M.D., an
23 individual; DR. VISHAL S. SHAH, M.D., an
24 individual; DOES 1-10; and ROES A-Z;,
25
26
27
28

 Defendants.

Supreme Court No.:

District Court No. 7-19-28878-C

Electronically Filed
Feb 27 2023 01:45 PM
Elizabeth A. Brown
Clerk of Supreme Court

16 **RESPONDENTS' APPENDIX VOLUME VI**

18 S. BRENT VOGEL

Nevada Bar No. 6858

19 ADAM GARTH

Nevada Bar No. 15045

Lewis Brisbois Bisgaard & Smith LLP

21 6385 South Rainbow Boulevard, Suite 600

22 Las Vegas, Nevada 89118

Telephone: 702-893-3383

23 Facsimile: 702-893-3789

24 *Attorneys for Respondet Valley Health System, LLC*
25 *dba Centennial Hills Hospital Medical Center*
26
27
28

1 **INDEX TO APPENDIX VOLUME VI**

2

| Number | Document | Date | Pages |
|--------|--|----------|---------|
| E | Defendant Valley Health System, LLC dba Centennial Hills Hospital Medical Center's Motion for Attorneys' Fees Pursuant to N.R.C.P. 68, N.R.S. §§ 17.117, 7.085, 18.010(2), and EDCR 7.60 | 2/2/2022 | 520-759 |

3
4
5

6 this 24th day of February, 2023

7
8 LEWIS BRISBOIS BISGAARD & SMITH LLP

9
10 By /s/ Adam Garth

11 S. Brent Vogel

12 Nevada Bar No. 006858

13 Adam Garth

14 Nevada Bar No. 15045

6385 S. Rainbow Boulevard, Suite 600

Las Vegas, Nevada 89118

Tel. 702.893.3383

15 Attorneys for Respondent Valley Health System,
16 LLC dba Centennial Hills Hospital Medical
17 Center

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 24th day of February, 2023, a true and correct copy
3 of **RESPONDENTS' APPENDIX VOLUME VI** was served by electronically filing with the Clerk
4 of the Court using the Odyssey E-File & Serve system and serving all parties with an email-address
5 on record, who have agreed to receive electronic service in this action.

6 Paul S. Padda, Esq.
7 PAUL PADDA LAW, PLLC
8 4560 S. Decatur Blvd., Suite 300
9 Las Vegas, NV 89103
10 Tel: 702.366.1888
11 Fax: 702.366.1940
12 psp@paulpaddalaw.com
13 *Attorneys for Plaintiffs*

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Brad Shipley, Esq.
JOHN. H. COTTON & ASSOCIATES
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jhcotton@jhcottonlaw.com
bshipleyr@jhcottonlaw.com
*Attorneys for Defendants Dionice S. Juliano,
M.D., Conrado Concio, M.D And Vishal S.
Shah, M.D.*

14 By /s/ Heidi Brown
15 An Employee of
16 LEWIS BRISBOIS BISGAARD & SMITH LLP
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1 (1) In General. If the offeree rejects an offer and fails to obtain a
2 more favorable judgment:

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

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

16

17 NRCP 68.

18 NRCP 68 provides that the Defendant would be entitled to "reasonable attorney
19 fees, if any be allowed." The language of the Rule specifically provides that Court with
20 "discretion," as it relates to attorney's fees, and the Court's discretion will not be
21 disturbed absent a clear abuse of such discretion. *Armstrong v. Riggi*, 92 Nev. 280,
22 549 P.2d 753 (1976); *Schouweiler v. Yancey Co.*, 101 Nev. 827, 712 P.2d 786 (1985);
23 *Bidart v. American Title Ins. Co.*, 103 Nev. 175, 734 P.3d 732 (1987).

24 In evaluating whether to grant an award of attorney's fees, pursuant to
25 *Schouweiler v. Yancey Co.*, 101 Nev. 827, 712 P.2d 786 (1985), the Court must
26 consider: "(1) whether plaintiff's claim was brought in good faith; (2) whether
27 defendant's offer of judgment was brought in good faith in both its timing and amount;
28 (3) whether plaintiff's decision to reject the offer and proceed to trial was grossly
unreasonable or in bad faith; and (4) whether fees sought by the offeror are reasonable
and justified in amount." *Schouweiler* at 833, citing *Beattie v. Thomas*, 99 Nev. 579,
588, 668 P.2d 268 (1983)(the "Beattie Factors").

In analyzing whether to award attorneys' fees, the factors which need to be
considered pursuant to *Brunzell*, include the following: (1) the qualities of the advocate:
his ability, training, education, experience, professional standing and skill; (2) the
character of the work to be done: its difficulty, intricacy, importance, the time and skill
required, the responsibility imposed and the prominence and character of the parties
when they affect the importance of the litigation; (3) the work actually performed by
the lawyer: the skill, time and attention given to the work; and (4) the result: whether

1 the attorney was successful and what benefits were derived. *Schouweiler* at 833-834,
2 citing to *Brunzell v. Golden Gate Nat'l Bank*, 85 Nev. 345, 349, 455 P.2d 31 (1969)
3 (quoting *Schwartz v. Schwerin*, 85 Ariz. 242, 336 P.2d 144, 146 (1959)).

4 With regard to the attorney's fees requested, this Motion is different from the
5 Motion for Fees filed by Drs. Concio and Shaw, in that CHH contends that it incurred
6 \$110,930.85 in attorney's fees since 8/28/20 (roughly twice the fees incurred by Drs.
7 Concio and Shaw). In considering the *Beattie* factors, the Court finds and concludes
8 that the plaintiff's claim was brought in good faith. The Court finds and concludes that
9 Defendant's offer of judgment, in the amount of \$0.00, (offering to waive
10 approximately \$58,500.00 in fees and costs), was brought in good faith in both its
11 timing and amount. The Court acknowledges that the parties disagree about this issue,
12 but as much as the Plaintiffs believed they had a valid case, the Defendants disputed
13 any liability. The Court further finds and concludes that Plaintiff's decision to reject the
14 offer and proceed to trial was not grossly unreasonable or in bad faith. Plaintiffs
15 believed they had a valid claim, and the Court cannot find that wanting some recovery,
16 as opposed to \$0.00, to be "grossly unreasonable" or in "bad faith. With regard to a
17 determination of whether the fees sought by the Defendants are reasonable and
18 justified in amount, a *Brunzell* analysis is required. *Beattie v. Thomas*, 99 Nev. 579,
19 588, 668 P.2d 268 (1983).

20 In determining the reasonableness of the fees requested, the Court has analyzed
21 the *Brunzell* factors, as follows: The Court finds that the qualities of defense counsel,
22 his ability, training, education, experience, professional standing and skill, favor an
23 award of fees. When considering the character of the work to be done - its difficulty,
24 intricacy, importance, the time and skill required, (when dealing with a professional
25 negligence/medical malpractice case), and finding that the character or prominence of
26 the parties was unremarkable, the complexity of the case warrants an award of fees.
27 The Court cannot evaluate the work actually performed by the lawyers, in this case, and
28 the skill, time and attention given to the work, without a detailed billing statement.
Although the Defendant has offered to submit a billing ledger to the Court in camera, it
would have been necessary for the Defendant to have submitted such ledger, and
disclosed it to the Plaintiff so that the reasonableness could have been addressed by all
parties, and by the Court. Finally, in considering the result, the Court notes that

1 although the Court found insufficient evidence to establish irrefutably that the statute
2 of limitations had expired, Defense counsel was successful in convincing the Supreme
3 Court of that, and consequently, Defendants prevailed. *Brunzell v. Golden Gate Nat'l*
4 *Bank*, 85 Nev. 345, 349, 455 P.2d 31 (1969). Based upon this NRCP 68 analysis, with
5 the exception of being able to analyze the reasonableness of the fees allegedly incurred,
6 the Court would likely have awarded at least some fees to the Defendant, at least for the
7 period of time after rejection of the Offer of Judgment. Without any evidence of the
8 fees actually accrued, and based on the amount requested, the Court cannot make a
9 finding as to the reasonableness of such fees, and consequently, the Court has no choice
under *Brunzell* and *Beattie*, to deny the request for Fees.

10 **CONCLUSION/ORDER**

11 Based upon the foregoing, and good cause appearing,

12 **IT IS HEREBY ORDERED** that the Defendants' Motion for Fees and Costs is
13 **DENIED.**

14 The Court requests that Plaintiff's counsel prepare and process a Notice of Entry
15 with regard to this Order.

16 Because this matter has been decided on the pleadings, the hearing scheduled
17 for 2/18/22 will be taken off calendar, and consequently, there is no need for any
18 parties or attorneys to appear.

19 Dated this 15th day of February, 2022

20 
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22
23 **99B B52 25DC 68DD**
24 **Jerry A. Wiese**
25 **District Court Judge**
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27
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1 **CSERV**

2
3 **DISTRICT COURT**
4 **CLARK COUNTY, NEVADA**

5
6 **Estate of Rebecca Powell,**
7 **Plaintiff(s)**

CASE NO: A-19-788787-C

8 **vs.**

DEPT. NO. Department 30

9 **Valley Health System, LLC,**
10 **Defendant(s)**

11 **AUTOMATED CERTIFICATE OF SERVICE**

12
13 This automated certificate of service was generated by the Eighth Judicial District
14 Court. The foregoing Order was served via the court's electronic eFile system to all
recipients registered for e-Service on the above entitled case as listed below:

15 **Service Date: 2/15/2022**

| | |
|----------------------------|--------------------------------------|
| 16 Paul Padda | psp@paulpaddalaw.com |
| 17 S. Vogel | brent.vogel@lewisbrisbois.com |
| 18 Jody Foote | jfoote@jhcottonlaw.com |
| 19 Jessica Pincombe | jpincombe@jhcottonlaw.com |
| 20 John Cotton | jhcotton@jhcottonlaw.com |
| 21 Brad Shipley | bshipley@jhcottonlaw.com |
| 22 Tony Abbatangelo | Tony@thevegaslawyers.com |
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| 24 Paul Padda | civil@paulpaddalaw.com |
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EXHIBIT E

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

June 11, 2020
Invoice No. 2677924

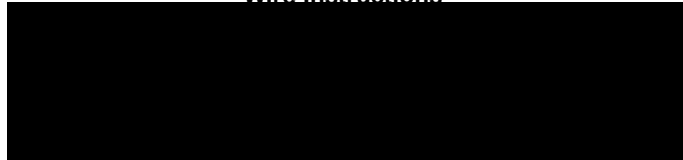
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|-------------------------------|-----------|
| Current Fees through 05/31/20 | 725.00 |
| Total Current Charges | \$ 725.00 |

*** Please return this page with your payment. ***

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
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SUITE 4000
633 W. FIFTH STREET
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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

File Number SBV1 28094-190 UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills 6/11/20
Page 1 2677924

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| 5/27/20 | SBV | Fact Investigation/Development: Communicate (Other Outside Counsel): Telephone conference with transferring counsel regarding case status and history in Powell v. Centennial Hills | .5 |
| 5/27/20 | SBV | Fact Investigation/Development: Research: Research regarding plaintiff's expert Sami Hashim, MD in Powell v. Centennial Hills | .7 |
| 5/27/20 | SBV | Fact Investigation/Development: Research: Online search regarding co-defendant Dr. Juliano, Dr. Concio and Dr. Shah | .9 |
| 5/27/20 | SBV | Pleadings: Review/Analyze: Analyze Complaint in Powell v. Centennial Hills Hospital | .5 |
| 5/27/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze court docket in Powell v. Centennial Hills regarding case history | .3 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|------------|----------------|---------------|
| S. Brent Vogel | 2.9 | 250.00 | 725.00 |
| Total | 2.9 | | 725.00 |

Total Fees 725.00
Total Current Charges \$ 725.00

LEWIS BRISBOIS BISGAARD & SMITH LLP

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SUITE 4000
633 W. FIFTH STREET
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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

July 14, 2020
Invoice No. 2701173

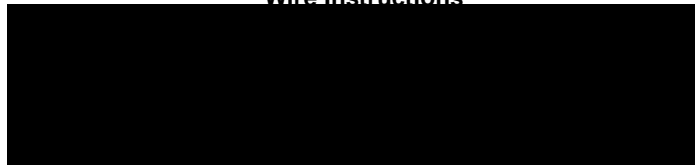
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 06/30/20 | 3,510.00 |
| Current Disbursements through 06/30/20 | 27.43 |
| Total Current Charges | \$ 3,537.43 |

*** Please return this page with your payment. ***

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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SUITE 4000
633 W. FIFTH STREET
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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

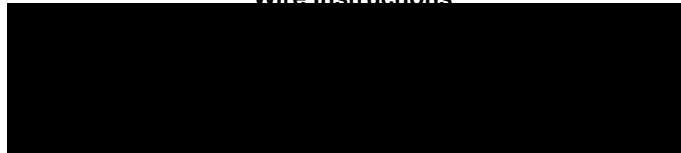
July 14, 2020
Invoice No. 2701173

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 06/30/20 | 3,510.00 |
| Current Disbursements through 06/30/20 | 27.43 |
| Total Current Charges | \$ 3,537.43 |

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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SUITE 4000
633 W. FIFTH STREET
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FEDERAL I.D. NO 95-3720522

| | | | |
|----------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 7/14/20 2701173 Page 1 |
|----------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| 6/01/20 | SBV | Fact Investigation/Development: Communicate (With Client): Telephone conference with Amanda Nichols to discuss case and facts of incident | .6 |
| 6/01/20 | SBV | Fact Investigation/Development: Plan & Prepare For: Preparation for initial meeting with Amanda Nichols to discuss case including review of docket, Complaint and available records | 1.3 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, NV Nursing Board request for documents to CHH regarding nurse Pawlak | .2 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, nurse Pawlak written statement | .4 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, NV Nursing Board request for documents against nurse Pawlak | .2 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, Care of Patient at Risk for Suicide Policy | .9 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, time clock records regarding nurse Pawlak | .1 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, nurse Pawlak employee file (50+ pages) | .8 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, billing records | .3 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze DHHS Complaint, CHH response and related materials | 1.2 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, NV Nursing Board Complaint against nurse Pawlak | .2 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, nurse Pawlak employee file (50+ pages) | .8 |
| 6/02/20 | SBV | Fact Investigation/Development: Review/Analyze: Analyze documents from client, Rapid Response Team report | .2 |
| 6/03/20 | AA | Experts/Consultants: Communicate (Other Outside Counsel): Correspondence with previous counsel re file of Rebecca Powell via telephone discussion. | .2 |
| 6/23/20 | AG | Experts/Consultants: Communicate (Other External): Telephone call with potential pharmacology expert, R. Ruffalo, MD to discuss any conflicts of interest and brief case overview for purposes of possible engagement. | .8 |
| 6/24/20 | AG | Experts/Consultants: Draft/Revise: Finalize letter to Dr. Ruffalo, pharmacology expert, containing documents for his review and opinion. | .1 |
| 6/24/20 | AG | Experts/Consultants: Communicate (Other External): Teleconference with potential hospitalist expert H. Shah, MD regarding possible retention, conflicts of interest and basics of case. | .5 |
| 6/24/20 | AG | Experts/Consultants: Communicate (With Client): Comprehensive email to R. Kim requesting authorization to retain Drs. Shah and Ruffalo as experts in the case (hospitalist and pharmacologist) as well as a discussion of case allegations and substantiation of need to retain each of these specialists to address the issues raised by plaintiff. | .5 |
| 6/24/20 | AG | Experts/Consultants: Draft/Revise: Finalize letter to Dr. Shah, hospitalist expert, containing documents for his review and opinion. | .1 |
| 6/25/20 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, re Rebecca Powell's medical records for his review and opinion in order to build defense of Powell v Valley Health Systems. | .2 |
| 6/25/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared correspondence and subcontractor agreement for retaining expert, Dr. Ruffalo, re Rebecca Powell's obtained medical records. | .2 |

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 7/14/20 2701173 Page 2 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| 6/25/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared correspondence and subcontractor agreement for retaining expert, Dr. Shah, re Rebecca Powell's obtained medical records. | .2 |
| 6/25/20 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ruffalo, re Rebecca Powell's medical records for his review and opinion in order to build defense of Powell v Valley Health Systems. | .2 |
| 6/26/20 | AG | Written Discovery: Draft/Revise: Commence drafting Valley Health's first set of interrogatories to decedent's estate. | .3 |
| 6/29/20 | AG | Written Discovery: Draft/Revise: Prepare Centennial Hills Hospital's first set of interrogatories to decedent's estate | 2.3 |
| 6/29/20 | AG | Written Discovery: Draft/Revise: Prepare and draft special interrogatories to plaintiffs' decedent's estate. | .8 |
| 6/29/20 | AG | Document Production: Draft/Revise: Begin preparation of requests for production of documents to plaintiff's decedent's estate including special requests for production. | 2.6 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|---|-------|------|--------|
| 6/15/20 | Filing Services American Legal Investigation Services Nevada, Inc. Inv#:37032124 06/03/20 McBride Hall 5150163 | | | 27.43 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|-----------------|
| Arielle Atkinson | 1.0 | 90.00 | 90.00 |
| Adam Garth | 8.0 | 225.00 | 1,800.00 |
| S. Brent Vogel | 7.2 | 225.00 | 1,620.00 |
| Total | 16.2 | | 3,510.00 |

| | |
|----------------------------|-----------------|
| Total Fees | 3,510.00 |
| Total Disbursements | 27.43 |

| | |
|------------------------------|--------------------|
| Total Current Charges | \$ 3,537.43 |
|------------------------------|--------------------|



American Legal Investigation Services Nevada, Inc

PI-PS 1452

P.O. BOX 841441

Dallas, TX 75284-1441

| | | | | |
|--------------------------------|----------|-------|----------------------------------|-------------|
| 55150163 | 6/03/20 | 11:51 | Lewis Brisbois Bisgaard -Rainbow | Csr: 270 |
| CONTROL NUMBER | | | | |
| PICKUP | | | DELIVER | |
| MCBRIDE HALL | | | Lewis Brisbois Bisgaard -Rainb | Base 31.00 |
| 8329 W. SUNSET RD | # 260 | | 6385 S RAINBOW | Return |
| LAS VEGAS | NV 89113 | | STE 600 | Wait |
| See: STEPHANIE | | | LAS VEGAS | Weight |
| Req: Johana Whitbec | | | | PDF/Ship |
| Svce: DELIVERY-REGULAR VEHICLE | | | | Atmpt/Addr |
| Acct: 37003 | | | PICK UP FILE | Research |
| Ref: 28094-190 | | | | Misc 3.57- |
| | | | | Fuel Chg |
| Sign: RETURNED/MARY ESTRAD | | 15:40 | | Adv.Fee |
| | | | | Check Chg |
| CName:POWELL V CENTENNIAL | | | | |
| | | | | Total 27.43 |

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

August 10, 2020
Invoice No. 2723465

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 07/31/20 | 10,192.50 |
| Current Disbursements through 07/31/20 | 4,353.50 |
| Total Current Charges | \$ 14,546.00 |

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All Charges in US Dollars

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Attn: Richard Kim
Manager- Claims

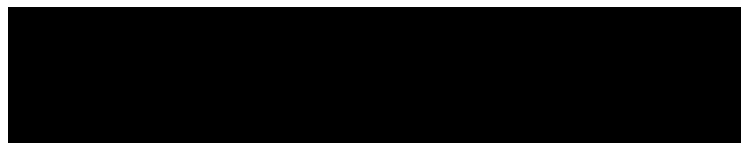
August 10, 2020
Invoice No. 2723465

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 07/31/20 | 10,192.50 |
| Current Disbursements through 07/31/20 | 4,353.50 |
| Total Current Charges | \$ 14,546.00 |

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 8/10/20 2723465 Page 1 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| 7/01/20 | AG | Document Production: Draft/Revise: Prepare Valley Health's first set of requests for production of documents to plaintiff Taryn Creecy | .9 |
| 7/01/20 | AG | Document Production: Draft/Revise: Continue preparation of Valley Health's first set of requests for production of documents to plaintiff's decedent's estate consisting of 84 requests for production plus 14 special request for production. | 2.6 |
| 7/01/20 | AG | Written Discovery: Draft/Revise: Prepare Valley Health's first set of interrogatories to plaintiff Isaiah Khosrof | 1.1 |
| 7/01/20 | AG | Analysis/Strategy: Communicate (Other External): Telephone conference with R. Kim to discuss initial case analysis strategy | .2 |
| 7/01/20 | AG | Document Production: Draft/Revise: Prepare Valley Health's first set of requests for production of documents to plaintiff Darci Creecy consisting of 87 requests. | 2.1 |
| 7/01/20 | AG | Document Production: Draft/Revise: Prepare Valley Health's first set of requests for production of documents to plaintiff Isaiah Khosrof | .7 |
| 7/01/20 | AG | Written Discovery: Draft/Revise: Prepare Valley Health's first set of interrogatories to plaintiff Darci Creecy | 1.6 |
| 7/01/20 | AG | Document Production: Draft/Revise: Prepare Valley Health's first set of requests for production of documents to plaintiff Lloyd Creecy | .6 |
| 7/01/20 | AG | Written Discovery: Draft/Revise: Prepare Valley Health's first set of interrogatories to plaintiff Taryn Creecy | .7 |
| 7/01/20 | AG | Written Discovery: Draft/Revise: Prepare Valley Health's first set of interrogatories to plaintiff Lloyd Creecy | .6 |
| 7/13/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared medical event history of Rebecca Powell re Centennial Hills Hospital records (583 pgs of 1166) in order to establish an accurate timeline of events in order to build defense in Powell v Centennial Hills Hospital. | 6.8 |
| 7/14/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared medical event history of Rebecca Powell re Centennial Hills Hospital records (583 pgs of 1166) in order to establish an accurate timeline of events in order to build defense in Powell v Centennial Hills Hospital. | 6.5 |
| 7/17/20 | AG | Written Discovery: Draft/Revise: Continue preparation of Centennial Hills' first set of interrogatories to Lloyd Creecy | .3 |
| 7/17/20 | AG | Written Discovery: Draft/Revise: Continue preparation of Centennial Hills' first set of interrogatories to decedent's estate. | .7 |
| 7/17/20 | AG | Document Production: Draft/Revise: Continue preparation of Centennial Hills' first requests for production of documents to decedent's estate. | .9 |
| 7/17/20 | AG | Document Production: Draft/Revise: Continue preparation of Centennial Hills' first requests for production of documents to Isaiah Khosrof. | .3 |
| 7/17/20 | AG | Written Discovery: Draft/Revise: Continue preparation of Centennial Hills' special interrogatories to decedent's estate. | .3 |
| 7/17/20 | AG | Document Production: Draft/Revise: Continue preparation of Centennial Hills' first requests for production of documents to Taryn Creecy. | .3 |
| 7/17/20 | AG | Written Discovery: Draft/Revise: Continue preparation of Centennial Hills' first set of interrogatories to Isaiah Khosrof. | .3 |
| 7/17/20 | AG | Written Discovery: Draft/Revise: Continue preparation of Centennial Hills' first set of interrogatories to Taryn Creecy. | .3 |
| 7/17/20 | AG | Written Discovery: Draft/Revise: Continue preparation of Centennial Hills' first set of interrogatories to Darci Creecy | .2 |
| 7/17/20 | AG | Document Production: Draft/Revise: Continue preparation of Centennial Hills' first requests for production of documents to Darci Creecy | .4 |
| 7/17/20 | AG | Document Production: Draft/Revise: Continue preparation of Centennial Hills' first requests for | |

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| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 8/10/20 2723465 Page 2 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| | | production of documents to Lloyd Creecy | .3 |
| 7/21/20 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, to discuss findings and opinion with Adam Garth via email. | .3 |
| 7/21/20 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ruffalo, to discuss findings and opinion with Adam Garth via email. | .3 |
| 7/21/20 | AG | Experts/Consultants: Communicate (Other External): Telephone call from Dr. Ruffalo, pharmacology expert, regarding representation and issues for discussion tomorrow pertaining to opinions. | .1 |
| 7/21/20 | AG | Experts/Consultants: Plan & Prepare For: Review and analyze decedent's medical records from Centennial Hills Hospital (1166 pages) for the purpose of preparing for telephone call with experts Drs. Ruffalo and Shah | 4.7 |
| 7/22/20 | AG | Experts/Consultants: Communicate (Other External): Telephone call with Dr. Ruffalo, pharmacology expert, regarding his opinions on standard of care and causation based upon records we have so far. | 2.2 |
| 7/22/20 | AG | Experts/Consultants: Plan & Prepare For: Review and analyze plaintiff's expert's declaration attached to complaint for purposes of preparing for telephone calls with experts Drs. Ruffalo and Shah pertaining to opinions as to standard of care and causation as they relate to both the physicians and the hospital (both direct negligence as well as on ostensible agency theories). | .6 |
| 7/22/20 | AG | Experts/Consultants: Communicate (Other External): Teleconference with hospitalist expert Dr. Shah regarding his review of records and opinions on standard of care and causation. | 1.6 |
| 7/22/20 | SBV | Experts/Consultants: Review/Analyze: Analysis regarding Dr. Ruffalo's expert review and opinions and potential for pulmonology critical care expert | .7 |
| 7/23/20 | AG | Analysis/Strategy: Draft/Revise: Begin preparation of report and summary of telephone conferences with expert pharmacologist and hospitalist regarding opinions concerning standard of care and causation. | 3.2 |
| 7/24/20 | AG | Analysis/Strategy: Communicate (Other External): Continue preparation of letter to R. Kim summarizing teleconferences with experts in pharmacology and hospital medicine, incorporating references to hospital record in further support of the basis of said opinions. | 3.4 |
| 7/24/20 | AG | Experts/Consultants: Review/Analyze: Continued review of decedent's medical records from CHH (1166 pages) based upon telephone calls to experts rendering opinions on standard of care and causation for purposes of incorporating the records into report on the phone calls with the experts. | 2.7 |
| 7/24/20 | SBV | Experts/Consultants: Review/Analyze: Analysis regarding Dr. Shah's and Dr. Ruffalo's initial opinions and impact on formulating defense on standard of care and causation | 1.2 |
| 7/28/20 | AG | Experts/Consultants: Review/Analyze: Review and analyze email from R. Kim authorizing use of pulmonology intensivist expert. | .1 |
| 7/28/20 | SBV | Analysis/Strategy: Draft/Revise: Revise and edit status report to client | 1.2 |
| 7/29/20 | AG | Experts/Consultants: Communicate (Other External): Email to R. Kim requesting authorization to engage Dr. Ishaaya as expert pulmonology/intensivist consultant. | .1 |
| 7/29/20 | AG | Experts/Consultants: Communicate (Other External): Email to Dr. A. Ishaaya, pulmonology/critical care specialist, regarding potential expert opportunity. | .1 |
| 7/29/20 | AG | Experts/Consultants: Review/Analyze: Review and analyze credentials for multiple physicians for purposes of ascertaining appropriate pulmonology/critical care expert to assist and opine on standard of care and causation as authorized by R Kim. | .6 |
| 7/29/20 | AG | Experts/Consultants: Review/Analyze: Review and analyze email from potential expert. Dr. Ishaaya, containing latest CV, rate sheet, testimony list for purposes of determining appropriateness for engagement as expert consultant. | .2 |

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|-------------------------|------------------|---|---------------------------------------|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 8/10/20 2723465 Page 3 |
|-------------------------|------------------|---|---------------------------------------|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| 7/29/20 | AG | Experts/Consultants: Communicate (Other External): Telephone conference with potential pulmonologist/critical care expert, Dr. Ishaaya, to discuss any conflicts, retention, focus of case and need for opinions on standard of care and causation. | 1.1 |
| 7/30/20 | AG | Experts/Consultants: Review/Analyze: Review and analyze email from R. Kim authorizing use of Dr. Ishaaya as the pulmonology/intensivist expert. | .1 |
| 7/30/20 | AG | Experts/Consultants: Draft/Revise: Review and finalize letter to pulmonology/critical care expert, Dr. Ishaaya, regarding retention and review of records. | .1 |
| 7/30/20 | AG | Experts/Consultants: Draft/Revise: Review, revise and finalize business subcontractor agreement with pulmonology/critical care expert, Dr. Ishaaya, | .1 |
| 7/31/20 | AA | Fact Investigation/Development: Communicate (Other External): Correspondence with retained expert, Dr. Ishaaya, re medical records of Rebecca Powell for his review and opinion in order to build defense in Powell v Centennial Hills Hospital. | .2 |
| 7/31/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared correspondence and medical records from Centennial Hills Hospital in order to be sent to retained expert, Dr. Ishaaya for his review and opinion. | .4 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|--|-------|------|----------|
| 7/14/20 | Court filing fee Comerica Commercial Card Services Inv#:063020STMT-ANOUWELS Trans Date: 06/08/2020 Nvefile* 006153274-0, Filing fee for substitution of attorney for defendant Valley Health System, LLC dba Centennial Hills Hospital Medical Center. | | | 3.50 |
| 7/22/20 | E123-Consulting Services Ruffalo & Associates, Inc. Inv#:2441 Professional services rendered on 06/24/20 - 07/22/20. | | | 4,350.00 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|------------------|
| Arielle Atkinson | 14.5 | 90.00 | 1,305.00 |
| Adam Garth | 36.4 | 225.00 | 8,190.00 |
| S. Brent Vogel | 3.1 | 225.00 | 697.50 |
| Total | 54.0 | | 10,192.50 |

| | |
|----------------------------|------------------|
| Total Fees | 10,192.50 |
| Total Disbursements | 4,353.50 |

| | |
|------------------------------|---------------------|
| Total Current Charges | \$ 14,546.00 |
|------------------------------|---------------------|

Case # A-19-788787-C - Estate of Rebecca Powell, Plaintiff**Envelope Information**

| | | |
|-------------------------------|---|--|
| Envelope Id 6153274 | Submitted Date 6/8/2020 3:38 PM PST | Submitted User Name johana.whitbeck@lewisbrisois.com |
|-------------------------------|---|--|

Case Information

| | | |
|---|--------------------------------|--|
| Location Department 30 | Category Civil | Case Type Malpractice - Medical/Dental |
| Case Initiation Date 2/4/2019 | Case # A-19-788787-C | |
| Assigned to Judge Wiese, Jerry A. | | |

Filings

| | |
|-------------------------------------|--|
| Filing Type EFileAndServe | Filing Code Substitution of Attorney - SUBT (CIV) |
|-------------------------------------|--|

Filing Description
Substitution Of Attorney For
Defendant Valley Health System,
LLC dba Centennial Hills Hospital
Medical Center

Client Reference Number
28094.190

| | |
|----------------------------------|--|
| Filing Status Accepted | Accepted Date 6/8/2020 3:40 PM PST |
|----------------------------------|--|

Accept Comments
Auto Review Accepted

Lead Document

| File Name | Description | Security | Download |
|----------------------------|--|-----------------------|-----------------------------|
| Sub of Attorney - LBBS.pdf | Substitution of Attorney - SUBT (CIV) | Public Filed Document | Original File Court Copy |

eService Details

<https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelo...> 6/25/2020

| Status | Name | Firm | Served | Date Opened |
|--------|---------------------|-------------------------------------|--------|----------------------|
| Sent | Paul S. Padda | PAUL PADDA LAW, PLLC | Yes | 6/8/2020 4:14 PM PS |
| Sent | Tony L. Abbatangelo | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | James P. Kelly | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | Fay Diab | Paul Padda Law, PLLC | Yes | Not Opened |
| Sent | Paul Padda | Paul Padda Law, PLLC | Yes | 6/8/2020 3:52 PM PS |
| Sent | S. Brent Vogel | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Kellie Piet | McBride Hall | Yes | Not Opened |
| Sent | Chelsea R. Hueth | McBride Hall | Yes | Not Opened |
| Sent | Robert C. McBride | McBride Hall | Yes | Not Opened |
| Sent | Cynthia Crizaldo | McBride Hall | Yes | Not Opened |
| Sent | Johana Whitbeck | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Michelle Newquist | McBride Hall | Yes | 6/9/2020 8:43 AM PS |
| Sent | Candace Cullina | McBride Hall | Yes | Not Opened |
| Sent | Tiffane Safar | McBride Hall | Yes | Not Opened |
| Sent | Stephanie Lazo | McBride Hall | Yes | Not Opened |
| Sent | Arielle Atkinson | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Richard D. Carroll | Carroll, Kelly, Trotter & Franzen | Yes | Not Opened |
| Sent | Theresa Lopez | Carroll, Kelly, Trotter & Franzen | Yes | 6/9/2020 8:42 AM PS |
| Sent | Jody Foote | John H. Cotton & Associates, Ltd. | Yes | 6/10/2020 3:03 PM PS |
| Sent | Jessica D. Pincombe | John H. Cotton & Associates, Ltd. | Yes | 6/8/2020 3:42 PM PS |
| Sent | John H. Cotton | John H. Cotton & Associates, Ltd. | Yes | Not Opened |
| Sent | Brad Shipley | John H. Cotton & Associates, Ltd. | Yes | 6/8/2020 3:39 PM PS |

Parties with No eService

Name **Address**
Isaiah Khosrof

Name **Address**
Lloyd Creecy

Name **Address**

<https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnvelope...> 6/25/2020

Taryn Creecy

| | |
|--------------|----------------|
| Name | Address |
| Darci Creecy | |

| | |
|-----------------------|----------------|
| Name | Address |
| Dionice S. Juliano MD | |

| | |
|-------------------|----------------|
| Name | Address |
| Vishal S. Shah MD | |

| | |
|--------------|----------------|
| Name | Address |
| Brian Powell | |

Fees**Substitution of Attorney - SUBT (CIV)**

| | |
|-----------------------------|---------------|
| Description | Amount |
| Filing Fee | \$0.00 |
| Filing Total: \$0.00 | |

| | |
|-------------------------------|--------|
| Total Filing Fee | \$0.00 |
| E-File Fee | \$3.50 |
| Envelope Total: \$3.50 | |

| | | | |
|-----------------------------------|-----------------------|---------------------------|---------|
| Party Responsible for Fees | Valley Health Syst... | Transaction Amount | \$3.50 |
| Payment Account | Autumn Nouwels | Transaction Id | 7281631 |
| Order Id | 006153274-0 | | |
| Transaction Response | Payment Complete | | |

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RUFFALO & ASSOCIATES, INC

RECEIVED

AUG 04 2020

Invoice #: 2441
Invoice Date: 7/22/2020
Terms: Net 30

RE: ESTATE OF REBECCA POWELL V. CENTENNIAL HILLS
HOSPITAL, ET AL / FILE NO. 28024-190

Initial discussion with Mr. Garth and agree to review case

0.25

150.00

Review of the plaintiff's complaint and the affidavit of Sami Hashim,
MD

0.5

300.00

Review of the decedent's medical records from Centennial Hills
Hospital sent via e-mail 06/24/2020 and comparison with Dr
Hashim's opinions

4.75

2,850.00

Discussion of the case with Mr. Garth 07/22/2020

1.75

1,050.00

TOTAL HOURS: 7.25

| | |
|------------------|------------|
| Total | \$4,350.00 |
| Payments/Credits | \$0.00 |
| Balance Due | \$4,350.00 |

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

September 11, 2020
Invoice No. 2756453

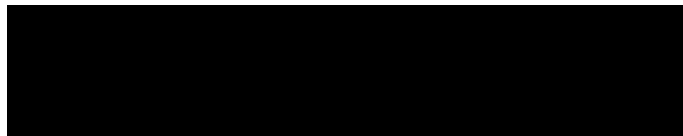
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 08/31/20 | 9,832.50 |
| Current Disbursements through 08/31/20 | 6,710.00 |
| Total Current Charges | \$ 16,542.50 |

*** Please return this page with your payment. ***

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

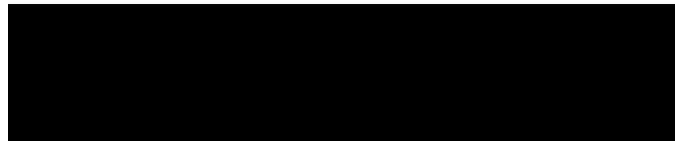
September 11, 2020
Invoice No. 2756453

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 08/31/20 | 9,832.50 |
| Current Disbursements through 08/31/20 | 6,710.00 |
| Total Current Charges | \$ 16,542.50 |

Wire Instructions



All Charges in US Dollars

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FEDERAL I.D. NO 95-3720522

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|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 9/11/20 2756453 Page 1 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| 8/10/20 | AG | Dispositive Motions: Draft/Revise: Prepare notice of non-opposition and joinder of co-defendants' motion for summary judgment regarding defendant Juliano and partial summary judgment as to emotional distress claims regarding all defendants. | 1.3 |
| 8/10/20 | AG | Analysis/Strategy: Communicate (Other Outside Counsel): Telephone call from co-defense counsel, B. Shipley, regarding strategy for pursuing summary judgment on statute of limitations, sharing of experts, and plaintiff's failure to produce any documentation supportive of claims. | .5 |
| 8/10/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze co-defendants' motion for summary judgment (113 pages) regarding defendant Juliano and partial summary judgment as to emotional distress claims regarding all defendants for purposes of ascertaining arguments made therein and need for adoption of same and filing non-opposition to and joinder of motion. | 1.6 |
| 8/10/20 | AG | Experts/Consultants: Communicate (Other External): Email to R. Kim requesting authority to share our experts and fees with co-defendants. | .1 |
| 8/10/20 | AG | Experts/Consultants: Communicate (Other Outside Counsel): Email to co-defense counsel regarding possible splitting of experts and fees and providing information regarding our experts for his review to obtain consent to fee split. | .2 |
| 8/10/20 | AG | Experts/Consultants: Plan & Prepare For: Review and analyze Centennial Hills Hospital records (1166 pages) for purposes of preparing for telephone call with pulmonology expert/intensivist, Avi Ishaaya, MD by reviewing order of CHH pulmonologist, Dr. Breeden. | 2.3 |
| 8/10/20 | AG | Experts/Consultants: Communicate (Other External): Telephone call with intensivist expert, Dr. Ishaaya, regarding opinions on standard of care ad causation. | 1.1 |
| 8/11/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff special administrator's responses to co-defendants' requests for admission for purposes of determining the specific claims which may or may not be viable including negligent infliction of emotional distress. | .3 |
| 8/11/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Taryn Creecy's responses to co-defendants' requests for admission for purposes of determining the specific claims which may or may not be viable including negligent infliction of emotional distress. | .3 |
| 8/11/20 | AG | Fact Investigation/Development: Communicate (With Client): Telephone call with A. Nichols, Risk Management Director at CHH regarding medical records inquiry from plaintiffs and case status and strategy as well as request for information on medical records production procedures. | .7 |
| 8/11/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Lloyd Creecy's responses to co-defendants' requests for admission for purposes of determining the specific claims which may or may not be viable including negligent infliction of emotional distress. | .2 |
| 8/11/20 | AG | Fact Investigation/Development: Plan & Prepare For: Review and analyze emails from risk management director as well as medical records produced by plaintiff and interviews with medical staff members at hospital for purposes of ascertaining the specific documents produced to plaintiffs, when the production was provided and the records they requested in order to obtain sufficient evidence to demonstrate that the case was filed beyond the statute of limitations in determining the propriety of summary judgment on that issue. | 1.4 |
| 8/11/20 | AG | Analysis/Strategy: Communicate (Other Outside Counsel): Continued conversation with co-defense counsel regarding strategy of pursuing summary judgment on issue of statute of limitations and further discovery strategies in order to obtain sufficient information from plaintiff on the root causes of action in order to pursue summary judgment on substantive issues of malpractice. | 1.0 |
| 8/11/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Isaiah Khorsof's responses to co-defendants' requests for admission for purposes of determining the specific claims | |

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FEDERAL I.D. NO 95-3720522

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|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 9/11/20 2756453 Page 2 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| | | which may or may not be viable including negligent infliction of emotional distress. | .2 |
| 8/11/20 | AG | Experts/Consultants: Draft/Revise: Prepare letter to R. Kim summarizing and reporting upon conference with A. Ishaaya, MD, pulmonology/critical care expert. | 2.1 |
| 8/11/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Darci Creecy's responses to co-defendants' requests for admission for purposes of determining the specific claims which may or may not be viable including negligent infliction of emotional distress. | .2 |
| 8/11/20 | SBV | Analysis/Strategy: Draft/Revise: Edit and finalize updated status report to Richard Kim | .5 |
| 8/14/20 | AG | Fact Investigation/Development: Communicate (With Client): Review, analyze and respond to email from A. Nichols along with attachments thereto regarding records sent to plaintiff prior to commencement of lawsuit and request for custodian of records information for purposes of moving for summary judgment on statute of limitations. | .3 |
| 8/14/20 | AG | Fact Investigation/Development: Communicate (With Client): Email to G. Arroyo regarding procedures involved in providing records to plaintiff based upon their initial request | .1 |
| 8/14/20 | AG | Fact Investigation/Development: Communicate (With Client): Extensive and detailed email to both custodian of records and medical records processing service outlining specific information needed regarding process of preparing records for distribution in this case and for purposes of preparing declaration for use on motion for summary judgment on statute of limitations. | .5 |
| 8/14/20 | AG | Fact Investigation/Development: Communicate (Other External): Telephone call with G. Arroyo from MRO regarding medical records procedures for purposes of obtaining facts to move for summary judgment. | .6 |
| 8/17/20 | AG | Fact Investigation/Development: Communicate (Other Outside Counsel): Telephone conference with co-defense counsel regarding evidence concerning statute of limitations arguments to make on motion for summary judgment. | .7 |
| 8/17/20 | AG | Fact Investigation/Development: Review/Analyze: Review and analyze email from MRO medical records services regarding timeline and associated evidence in production of medical records to plaintiffs. | .3 |
| 8/17/20 | SBV | Written Discovery: Review/Analyze: Analyze Plaintiff Estate's Responses to Co-Defendant's Requests for Admissions | .2 |
| 8/17/20 | SBV | Written Discovery: Review/Analyze: Analyze D. Creecy's Responses to Co-Defendant's Requests for Admissions | .2 |
| 8/17/20 | SBV | Written Discovery: Review/Analyze: Analyze I. Khorsrof's Responses to Co-Defendant's Requests for Admissions | .2 |
| 8/17/20 | SBV | Written Discovery: Review/Analyze: Analyze T. Creecy's Responses to Co-Defendant's Requests for Admissions | .2 |
| 8/17/20 | SBV | Written Discovery: Review/Analyze: Analyze L. Creecy's Responses to Co-Defendant's Requests for Admissions | .2 |
| 8/18/20 | AG | Written Discovery: Review/Analyze: Review and analyze emails correspondence between co-defense and plaintiff's counsel regarding plaintiff's counsel's misunderstanding and misrepresentation of agreements for extension of time to respond to discovery and motion for summary judgment. | .2 |
| 8/19/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Email to plaintiff's counsel regarding strategy concerning extension of time for plaintiff to respond to motion for summary judgment. | .2 |
| 8/19/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze email from plaintiff's counsel along with stipulation seeking extension of time to respond to co-defendant's motion for summary judgment on negligent infliction of emotional distress claims | .2 |
| 8/19/20 | AG | Fact Investigation/Development: Communicate (With Client): Telephone call with M. | |

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FEDERAL I.D. NO 95-3720522

File Number SBV1 **28094-190**

**UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills**

9/11/20
2756453
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| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| | | Thompson, CHH's custodian of records, to gather necessary facts to draft declaration in support of motion for summary judgment on statute of limitations. | .4 |
| 8/19/20 | AG | Written Discovery: Communicate (Other External): Email to plaintiff's counsel regarding stipulations to extend time to respond to summary judgment motion and co-defendant's discovery demands, in addition to reminder of our separate agreement to respond to our discovery demands by deadlines already extended. | .3 |
| 8/19/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review, analyze and respond to email from plaintiff's counsel regarding revised stipulation extending time to oppose motion for summary judgment by co-defense counsel and our joinder thereto. | .2 |
| 8/21/20 | AG | Dispositive Motions: Communicate (Other External): Email to plaintiff's counsel agreeing to stipulations regarding motion for summary judgment and response to co-defendant's discovery. | .1 |
| 8/21/20 | AG | Other Written Motions & Submiss.: Communicate (Other External): Phone call from plaintiff's counsel regarding stipulations to extend time to respond to co-defendant's summary judgment motion and co-defendants' interrogatories. | .2 |
| 8/24/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze email from R. Kim approving motion for summary judgment. | .1 |
| 8/24/20 | AG | Dispositive Motions: Communicate (With Client): Email to R. Kim requesting authorization to move for summary judgment on statute of limitations along with extensive justification for the motion itself. | .4 |
| 8/24/20 | AG | Dispositive Motions: Communicate (Other External): Telephone call from plaintiff's counsel regarding agreement to stipulation to extend deadlines on co-defendant's motion for summary judgment. | .2 |
| 8/24/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze court order for hearing on co-defendant's motion and our joinder thereto for summary judgment against plaintiffs oi issue of negligent infliction of emotional distress. | .1 |
| 8/24/20 | AG | Dispositive Motions: Draft/Revise: Prepare declaration for G. Arroyo from MRO regarding medical records gathering and provision procedures for purposes of supporting motion for summary judgment. | 1.2 |
| 8/25/20 | AG | Dispositive Motions: Draft/Revise: Continue preparation of declaration of Gina Arroyo from MRO regarding procedures involved in gathering medical records and providing same to requestor for purposes of attaching to motion for summary judgment. | .4 |
| 8/25/20 | AG | Dispositive Motions: Draft/Revise: Prepare declaration for M. Thompson, CHH's custodian of records, for purposes of motion for summary judgment. | .5 |
| 8/26/20 | AG | Dispositive Motions: Research: Legal research regarding specific instances of inquiry notice of plaintiffs in medical malpractice cases for purposes of incorporating same into motion for summary judgment on statute of limitations. | 1.4 |
| 8/26/20 | AG | Dispositive Motions: Review/Analyze: Review, analyze and respond to email from G. Arroyo requesting changes to declaration and response thereto containing said changes. | .2 |
| 8/26/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze plaintiffs' complaint and annexed medical affidavit for purposes of incorporating same into motion for summary judgment on statute of limitations. | .8 |
| 8/26/20 | AG | Dispositive Motions: Communicate (With Client): Email to records custodian, M. Thompson, along with declaration to support motion for summary judgment and request for edits if any. | .1 |
| 8/26/20 | AG | Dispositive Motions: Draft/Revise: Begin drafting of motion for summary judgment based upon statute of limitations including the incorporation of a complete procedural history of case, timeline for plaintiffs' inquiry notice of professional negligence and legal analysis of recent cases and statutes pertaining to issue. | 5.7 |

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

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| Date | Atty | Description of Services Rendered | Hours |
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| 8/26/20 | AG | Dispositive Motions: Communicate (Other External): Email to records retrieval service area manager from MRO, Gina Arroyo, along with declaration to support motion for summary judgment and request for edits if any. | .1 |
| 8/27/20 | AG | Experts/Consultants: Review/Analyze: Review and analyze email from Dr. Ishaaya, intensivist and pulmonology expert, regarding invoice for review and consultation services and opinions regarding case. | .1 |
| 8/27/20 | AG | Analysis/Strategy: Communicate (With Client): Email to R. Kim requesting authorization to serve offer of judgment for waiver of costs and analysis of the process and implications thereof. | .3 |
| 8/27/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Telephone conference with co-defense counsel regarding strategy pertaining to motion for summary judgment and possibility of offer of judgment. | .5 |
| 8/27/20 | AG | Dispositive Motions: Draft/Revise: Continue preparation of motion for summary judgment on issue of statute of limitations including a complete analysis of the procedural history and incorporation of evidence demonstrating that plaintiffs had been placed inquiry notice of all events as of the date of the decedent's death. | 4.6 |
| 8/28/20 | AG | Dispositive Motions: Communicate (Other External): Review, analyze and respond to email from G. Arroyo regarding declaration in support of motion for summary judgment. | .2 |
| 8/28/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze email from R. Kim authorizing the filing of an offer of judgment for waiver of costs. | .1 |
| 8/28/20 | AG | Other Written Motions & Submiss.: Communicate (Other Outside Counsel): Email to C. Tyler, predecessor counsel, regarding past costs and fees for purposes of incorporating same into offer of judgment to plaintiffs. | .1 |
| 8/28/20 | AG | Settlement/Non-Binding ADR: Review/Analyze: Review and analyze email from predecessor counsel containing their costs and disbursements as well as current billing records for purposes of incorporating same into offer of judgment. | .4 |
| 8/28/20 | AG | Other Written Motions & Submiss.: Communicate (With Client): Email to R. Kim along with copy of offer of judgment to plaintiffs and strategy moving forward pertaining to it and upcoming motion for summary judgment. | .1 |
| 8/28/20 | AG | Dispositive Motions: Draft/Revise: Continue preparation of motion for summary judgment. | 3.3 |
| 8/28/20 | AG | Settlement/Non-Binding ADR: Draft/Revise: Draft offer of judgment pursuant to NRCP Rule 68 to plaintiffs. | .9 |
| 8/28/20 | SBV | Dispositive Motions: Research: Follow up research on statute of limitations argument in professional negligence cases for use in Motion for Summary Judgment | 1.9 |
| 8/28/20 | SBV | Dispositive Motions: Draft/Revise: Analyze and edit draft Motion for Summary Judgment | .9 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|---|-------|------|----------|
| 8/26/20 | Medical Expert Services Abraham Ishaaya Inv#:POWELL,R-080220 Expert medical services rendered on 08/02/20 - 08/10/20. | | | 6,710.00 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------|----------------|-----------|
| Adam Garth | 39.4 | 225.00 | 8,865.00 |
| | .2 | | No Charge |

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| Recap of Services | | Hours | Effective Rate | Fees |
|-----------------------|--|-------|-------------------|--------------|
| S. Brent Vogel | | 4.3 | 225.00 | 967.50 |
| Total | | 43.9 | | 9,832.50 |
| Total Fees | | | | 9,832.50 |
| Total Disbursements | | | | 6,710.00 |
| Total Current Charges | | | | \$ 16,542.50 |

Abraham Ishaaya, M.D., F.C.C.P.

RECEIVED
AUG 26 2020

August 26, 2020

#1POWELL

LEWIS BRISBOIS
ATT: Adam Garth
6385 South Rainbow Blvd., Suite 600
Las Vegas, NV 89118

RE: CASE NAME: Estate of Rebecca Powell v Centennial Hills Hospital

Dear Adam:

Enclosed please find my charges to present for the above case.

Review of:

| | | |
|------|--|-----------|
| 8-2 | Complaint | .6 hours |
| | Affidavit of Dr. Sami Hashim | .4 hours |
| 8-4 | Centennial Hills Hospital records (1-600) | 5.4 hours |
| 8-6 | Centennial Hills Hospital records (601-1166) | 4.8 hours |
| 8-10 | Telephone call | 1 hour |

Total hours: 12.2 hours @ \$550

Total owed: \$6,710

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,



Avi Ishaaya, M.D.

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

October 12, 2020
Invoice No. 2777320

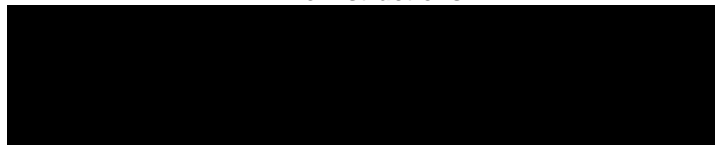
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 09/30/20 | 19,642.50 |
| Current Disbursements through 09/30/20 | 3,178.50 |
| Total Current Charges | \$ 22,821.00 |

*** Please return this page with your payment. ***

Wire Instructions



All Charges in US Dollars

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

October 12, 2020
Invoice No. 2777320

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

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|--|--------------|
| Current Fees through 09/30/20 | 19,642.50 |
| Current Disbursements through 09/30/20 | 3,178.50 |
| Total Current Charges | \$ 22,821.00 |

Wire Instructions



All Charges in US Dollars

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| Date | Atty | Description of Services Rendered | Hours |
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| 9/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Darci Creecy's responses to CHH's interrogatories (30 pages) for purposes of determining responsiveness and improper objection assertions and for summary purposes to client. | .8 |
| 9/01/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Darci Creecy's responses to CHH's requests for production of documents (55 pages) for purposes of determining responsiveness and improper objection assertions and for summary purposes to client. | .9 |
| 9/01/20 | AG | Dispositive Motions: Draft/Revise: Revise motion for summary judgment incorporating changes in G. Arroyo declaration. | .4 |
| 9/01/20 | AG | Written Discovery: Communicate (Other External): Email to plaintiffs' counsel requesting EDCR 2.34 conference and advising of the myriad of discovery issues with their responses. | .4 |
| 9/01/20 | AG | Written Discovery: Research: Conduct legal research into cases cited by plaintiffs in their objections to discovery to ascertain propriety and applicability of cases and obtain case law which counters that which was asserted by plaintiffs | 1.3 |
| 9/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Lloyd Creecy's responses to CHH's interrogatories (28 pages) for purposes of determining responsiveness and improper objection assertions and for summary purposes to client. | .7 |
| 9/01/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Isaiah Khosrof's responses to CHH's requests for production of documents (55 pages) for purposes of determining responsiveness and improper objection assertions and for summary purposes to client. | .8 |
| 9/01/20 | AG | Dispositive Motions: Communicate (Other External): Review, analyze and respond to email from G. Arroyo from MRO along with attached revised declaration in support of motion for summary judgment to determine acceptability thereof. | .4 |
| 9/01/20 | AG | Written Discovery: Communicate (Other External): Telephone call with plaintiffs' counsel and co-defense counsel outlining base issues concerning plaintiffs' discovery responses and request for EDCR 2.34 conference. | .3 |
| 9/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Isaiah Khosrof's responses to CHH's interrogatories (28 pages) for purposes of determining responsiveness and improper objection assertions and for summary purposes to client. | .8 |
| 9/01/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Lloyd Creecy's responses to CHH's requests for production of documents (55 pages) for purposes of determining responsiveness and improper objection assertions and for summary purposes to client. | .9 |
| 9/01/20 | AG | Written Discovery: Communicate (Other Outside Counsel): Telephone conference with co-defense counsel regarding plaintiffs' discovery responses to interrogatories and requests for production of documents and strategizing regarding issues associated therewith. | 1.2 |
| 9/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Taryn Creecy's responses to CHH's interrogatories (30 pages) for purposes of determining responsiveness and improper objection assertions and for summary purposes to client. | .8 |
| 9/01/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Taryn Creecy's responses to CHH's requests for production of documents (55 pages) for purposes of determining responsiveness and improper objection assertions and for summary purposes to client. | .9 |
| 9/01/20 | SBV | Written Discovery: Review/Analyze: Analyze Lloyd Creecy's Responses to Requests for Production | .7 |
| 9/01/20 | SBV | Written Discovery: Review/Analyze: Analyze Darcy Creecy's Responses to Requests for Production | .6 |

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| Date | Atty | Description of Services Rendered | Hours |
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| 9/01/20 | SBV | Dispositive Motions: Draft/Revise: Edit and finalize Motion for Summary Judgment based on statute of limitations | .9 |
| 9/01/20 | SBV | Written Discovery: Review/Analyze: Analyze Isaiah Khosrof's Answers to Interrogatories | .5 |
| 9/01/20 | SBV | Written Discovery: Review/Analyze: Analyze Taryn Creecy's Answers to Interrogatories | .5 |
| 9/01/20 | SBV | Written Discovery: Review/Analyze: Analyze Lloyd Creecy's Answers to Interrogatories | .5 |
| 9/01/20 | SBV | Written Discovery: Review/Analyze: Analyze Darcy Creecy's Answers to Interrogatories | .5 |
| 9/01/20 | SBV | Written Discovery: Review/Analyze: Analyze Isaiah Khosrof's Responses to Requests for Production | .5 |
| 9/01/20 | SBV | Written Discovery: Review/Analyze: Analyze Taryn Creecy's Responses to Requests for Production | .5 |
| 9/02/20 | AG | Written Discovery: Review/Analyze: Review and analyze estate's responses to CHH's special interrogatories for purposes of summarizing same and determining propriety of responses and objections raised therein | .4 |
| 9/02/20 | AG | Fact Investigation/Development: Review/Analyze: Review and analyze email from A. Nichols containing the joint commission investigation report (32 pages) and associated emails for purposes of ascertaining when plaintiffs suspected potential malpractice. | .5 |
| 9/02/20 | AG | Written Discovery: Review/Analyze: Review and analyze estate's responses to CHH's interrogatories (30 pages) for purposes of summarizing information contained therein and propriety of responses and objections raised therein. | .9 |
| 9/02/20 | AG | Written Discovery: Communicate (Other External): Review, analyze and respond to email from plaintiff's counsel regarding EDCR 2.34 conference. | .3 |
| 9/02/20 | AG | Written Discovery: Draft/Revise: Draft letter to plaintiffs' counsel in advance of EDCR 2.34 conference to specifically outline the objections CHH has to plaintiffs' discovery responses. | 1.6 |
| 9/02/20 | AG | Written Discovery: Research: Legal research of cases cited regarding estate's objections raised by plaintiffs in responses to interrogatories to determine applicability thereof | .6 |
| 9/02/20 | AG | Analysis/Strategy: Communicate (With Client): Detailed email to R. Kim outlining litigation strategy, updates on discovery and potential responses to our MSJ by plaintiffs with analysis of replies thereto. | .7 |
| 9/02/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff estate's responses to CHH's requests for production of documents (64 pages) to ascertain completeness thereof, issues regarding improperly interposed objections for purposes of obtaining proper responses thereto. | 1.1 |
| 9/02/20 | AG | Fact Investigation/Development: Communicate (With Client): Telephone conference with A. Nichols regarding meeting she had with plaintiffs right after the incident as disclosed by estate representative in response to discovery | .9 |
| 9/02/20 | SBV | Written Discovery: Review/Analyze: Analyze Special Administrator's answers to interrogatories | .5 |
| 9/02/20 | SBV | Written Discovery: Review/Analyze: Analyze Special Administrator's responses to requests for production | .7 |
| 9/02/20 | SBV | Written Discovery: Review/Analyze: Analyze Special Administrator's answers to special interrogatories | .4 |
| 9/03/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze co-defendants' joinder to CHH's motion for summary judgment. | .3 |
| 9/03/20 | AG | Written Discovery: Draft/Revise: Continue preparation of extensive letter to plaintiffs' counsel (19 pages) analyzing and describing all discovery disputes from plaintiffs' responses to CHH's discovery demands for purposes of providing agenda for upcoming EDCR 2.34 teleconference. | 6.2 |
| 9/09/20 | AG | Analysis/Strategy: Communicate (Other Outside Counsel): Call from co-defense counsel | |

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| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 10/12/20 2777320 Page 3 |
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| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| | | regarding results of EDCR 2.34 conference and strategy on how to proceed further. | .4 |
| 9/09/20 | AG | Other Written Motions & Submiss.: Research: Legal research on viability of attorneys' fees and costs for baseless claim in light of disclosure by plaintiffs that they had inquiry notice in June 2017, demonstrating that action was brought beyond the statute of limitations with knowledge thereof. | 1.3 |
| 9/09/20 | AG | Court Mandated Conferences: Appear For/Attend: Attend EDCR 2.34 conference call with plaintiffs' counsel and co-defense counsel to attempt to resolve discovery disputes without need for motion practice. | .6 |
| 9/09/20 | AG | Document Production: Communicate (Other Outside Counsel): Phone call from co-defense counsel regarding strategy for upcoming EDCR 2.34 conference as well as discussion of plaintiff's disclosures which demonstrate inquiry notice date for running of statute of limitations. | .7 |
| 9/09/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiffs' first supplemental NRCP 16.1 disclosure with attached documents (1391 pages) for purposes of preparing for EDCR 2.34 conference call and evaluate same to determine relevancy to provide to experts for review as well as to determine applicability to issues raised by plaintiffs | 3.7 |
| 9/09/20 | AG | Written Discovery: Review/Analyze: Review and analyze letter to plaintiffs' counsel outlining the discovery deficiencies in preparation for EDCR 2.34 conference call. | .4 |
| 9/09/20 | SBV | Document Production: Review/Analyze: Analyze unreferenced document production from plaintiff and comparison to existing productions (450+ pages) | 2.8 |
| 9/10/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared Defendant's First Supplement to Initial 16.1 Disclosure supplementing records and additional records disclosed by Plaintiff's in order to continue to build defense in Estate of Rebecca Powell v Centennial Hills Hospital. | .3 |
| 9/10/20 | AG | Experts/Consultants: Communicate (Other External): Telephone call from pharmacology expert, Dr. Ruffalo, regarding newly exchanged documents including autopsy report and nursing board complaint and findings of state. | .5 |
| 9/10/20 | AG | Analysis/Strategy: Communicate (With Client): Email to R Kim with report of teleconference with R. Ruffalo, MD, pharmacology expert's? analysis of plaintiffs' disclosure of HHS report and admission contained therein, and strategy with respect to our MSJ and plaintiffs' disclosures demonstrating early inquiry notice. | .8 |
| 9/15/20 | AG | Experts/Consultants: Communicate (Other External): Telephone cal with expert A. Ishayya, MD to discuss latest disclosures and HHS records and coroner's report for purposes of determining breaches of standard of care and liability as well as possible damage mitigation assessments. | .5 |
| 9/15/20 | AG | Experts/Consultants: Plan & Prepare For: Review and analyze excerpts from plaintiffs' first supplemental NRCP 16.1 disclosure including affidavit of death, death certificate, coroner's investigation report, nursing board complaint from Brian Powell, HHS report, and additional medical records (approximately 200 pages) for purposes of preparing for phone call with critical care expert, A. Ishaaya, MD. | 1.8 |
| 9/15/20 | AG | Analysis/Strategy: Communicate (With Client): Teleconference with A Nichols to discuss HHS report and admissions of staff as well as expert's evaluation. | .4 |
| 9/15/20 | AG | Document Production: Communicate (With Client): Email to A. Nichols with HHS report. | .1 |
| 9/16/20 | AA | Fact Investigation/Development: Review/Analyze: Detailed legal analysis of Plaintiff's First Supplemental 16.1 Disclosure (400 of 1376 pgs) in order the need for additional discovery in order to build defense in Estate of Rebecca Powell v Centennial Hills Hospital. | 6.0 |
| 9/16/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff estate's responses to co-defendant's interrogatories for purposes of comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of | |

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| Date | Atty | Description of Services Rendered | Hours |
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| | | cause of action. | .4 |
| 9/16/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Isaiah Khorsof's responses to co-defendant's interrogatories for purposes of comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of cause of action. | .4 |
| 9/16/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Lloyd Creecy's responses to co-defendant's requests for production of documents for purposes of comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of cause of action. | .3 |
| 9/16/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Isaiah Khorsof's responses to co-defendant's requests for production of documents for purposes of comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of cause of action. | .3 |
| 9/16/20 | AG | Dispositive Motions: Research: Legal research on imputed knowledge of inquiry notice and unity of interest in preparation for reply to plaintiffs' opposition to CHH's motion for summary judgment. | .9 |
| 9/16/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Taryn Creecy's responses to co-defendant's interrogatories for purposes of comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of cause of action. | .4 |
| 9/16/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Taryn Creecy's responses to co-defendant's requests for production of documents for purposes of comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of cause of action. | .3 |
| 9/16/20 | AG | Dispositive Motions: Research: Legal research on issues of inquiry notice of injury for purposes of statute of limitations purposes as issues of discovery and fraudulent concealment in preparation for reply to plaintiffs' opposition to CHH's motion for summary judgment | 1.6 |
| 9/16/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze email and accompanying proposed orders from plaintiffs' counsel denying priors motions to dismiss for purposes of determining accuracy thereof in accordance with minutes of hearing. | .3 |
| 9/16/20 | AG | Experts/Consultants: Communicate (Other External): Email to R. Kim regarding summary of telephone conference with Dr. Ishaaya , our critical care expert, pertaining to plaintiffs' recent disclosure of HHS report. | .3 |
| 9/16/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Darci Creecy's responses to co-defendant's interrogatories for purposes of comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of cause of action. | .4 |
| 9/16/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff estate's responses to co-defendant's requests for production of documents for purposes of comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of cause of action. | .3 |
| 9/16/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Lloyd Creecy's responses to co-defendant's interrogatories for purposes of comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of cause of action. | .3 |
| 9/16/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Darci Creecy's responses to co-defendant's requests for production of documents for purposes of | |

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File Number 28094-190
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UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills

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2777320
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| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| | | comparing same to answers to our interrogatories and for use on reply to our motion for summary judgment regarding notice of cause of action. | .3 |
| 9/16/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Telephone call with co-defense counsel to analyze and strategize regarding plaintiffs' proposed orders pertaining to earlier filed motions to dismiss | .9 |
| 9/17/20 | AA | Fact Investigation/Development: Review/Analyze: Detailed legal analysis of Plaintiff's First Supplemental 16.1 Disclosure (500 of 1376 pgs) in order the need for additional discovery and to establish any additional facilities or witnesses in order to build defense in Estate of Rebecca Powell v Centennial Hills Hospital. | 7.5 |
| 9/17/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze plaintiffs' opposition to CHH's motion for summary judgment and related exhibits (100 pages) including analysis of all cases cited therein for purposes of preparing reply thereto. | 1.7 |
| 9/17/20 | AG | Document Production: Communicate (Other External): Email to plaintiffs' counsel regarding EDCR 2.34 conference. | .1 |
| 9/17/20 | AG | Dispositive Motions: Draft/Revise: Begin preparation of reply to plaintiffs' opposition to CHH's motion for summary judgment including new arguments for fraudulent concealment and inquiry notice pertaining to the commencement of the running of the statute of limitations, plus incorporation of plaintiffs' recently disclosed evidence demonstrating inquiry notice commencement date. | 6.3 |
| 9/17/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Teleconference with co-defense counsel to discuss strategy regarding reply to plaintiffs' opposition to CHH motion for summary judgment. | .3 |
| 9/17/20 | AG | Document Production: Review/Analyze: Review and analyze letter from plaintiffs' counsel requesting EDCR 2.34 conference regarding medical authorization. | .1 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze L. Creecy's Responses to co-defendants' Requests for Production | .3 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze D. Creecy's Responses to co-defendants' Requests for Production | .3 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze L. Creecy's Responses to co-defendants' Interrogatories | .4 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze D. Creecy's Responses to co-defendants' Interrogatories | .3 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze Estate's responses to co-defendants' interrogatories | .5 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze I. Khosrof's Responses to co-defendants' Interrogatories | .3 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze T. Creecy's Responses to co-defendants' Interrogatories | .3 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze Estate's Responses to co-defendants' Requests for Production | .3 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze I. Khosrof's Responses to co-defendants' Requests for Production | .3 |
| 9/17/20 | SBV | Written Discovery: Review/Analyze: Analyze T. Creecy's Responses to co-defendants' Requests for Production | .3 |
| 9/18/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared request to Custodian of Records for Psychological Care Associates re plaintiff's medical records. | .2 |
| 9/18/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared request to Custodian of Records for Shadow Emergency Physicians re plaintiff's medical records. | .2 |

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

File Number SBV1 **28094-190**

**UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills**

10/12/20
2777320
Page 6

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| 9/18/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared request to Custodian of Records for NMS labs re plaintiff's medical records. | .2 |
| 9/18/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared request to Custodian of Records for American Medical Response re plaintiff's medical records. | .2 |
| 9/18/20 | AA | Fact Investigation/Development: Review/Analyze: Detailed legal analysis of Plaintiff's First Supplemental 16.1 Disclosure (476 of 1376 pgs) in order the need for additional discovery and to establish any additional facilities or witnesses in order to build defense in Estate of Rebecca Powell v Centennial Hills Hospital. | 6.5 |
| 9/18/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared request to Custodian of Records for Desert Radiology? re plaintiff's medical records. | .2 |
| 9/18/20 | AA | Fact Investigation/Development: Plan & Prepare For: Prepared request to Custodian of Records for Medical Care Now re plaintiff's medical records. | .2 |
| 9/18/20 | AG | Dispositive Motions: Communicate (Other External): Review, analyze and respond to email from court regarding its sua sponte continuance of all dispositive motions. | .2 |
| 9/18/20 | AG | Dispositive Motions: Draft/Revise: Continue preparation of reply to plaintiffs' opposition to CHH's motion for summary judgment. | 2.4 |
| 9/18/20 | AG | Dispositive Motions: Communicate (With Client): Email to R. Kim advising of the continuance of motions for summary judgment as well as strategy and status pertaining to reply to plaintiffs' opposition thereto. | .1 |
| 9/18/20 | SBV | Dispositive Motions: Review/Analyze: Analyze plaintiff's opposition to motion for summary judgment | .5 |
| 9/18/20 | SBV | Dispositive Motions: Draft/Revise: Edit and revise Reply in Support of Motion for Summary Judgment | 1.3 |
| 9/18/20 | SBV | Dispositive Motions: Research: Legal research regarding elements of fraudulent concealment in medical malpractice context | .8 |
| 9/21/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze email from plaintiff's counsel regarding proposed orders pertaining to prior motions to dismiss. | .1 |
| 9/21/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze email from co-defense counsel regarding plaintiff's proposed orders | .1 |
| 9/22/20 | AG | Court Mandated Conferences: Communicate (Other Outside Counsel): Telephone call with co-defense counsel to organize strategy for upcoming EDCR 2.34 conference call. | .3 |
| 9/22/20 | AG | Court Mandated Conferences: Review/Analyze: Review and analyze email from plaintiffs' counsel regarding EDCR 2.34 conference. | .1 |
| 9/23/20 | AG | Dispositive Motions: Draft/Revise: Continue preparation of reply to plaintiff's opposition to our motion for summary judgment to include issues surrounding dismissal of negligent infliction of emotional distress claims and the medical malpractice statute of limitations applicability thereto as they stem from the alleged malpractice. | 3.8 |
| 9/24/20 | AG | Court Mandated Conferences: Plan & Prepare For: Review and analyze plaintiff Darci Creecy's responses to interrogatories in preparation for EDCR 2.34 conference call requested by plaintiff's counsel for purposes of determining pre-existing injuries as justification for medical authorizations. | .3 |
| 9/24/20 | AG | Court Mandated Conferences: Appear For/Attend: Attend mandatory EDC R 2.34 conference call with all parties regarding plaintiffs' counsel's issues with authorizations for medical records. | .3 |
| 9/24/20 | AG | Court Mandated Conferences: Plan & Prepare For: Review and analyze plaintiff Taryn Creecy's responses to interrogatories in preparation for EDCR 2.34 conference call requested by plaintiff's counsel for purposes of determining pre-existing injuries as justification for medical authorizations. | .3 |

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FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|-----------|---|--|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 10/12/20 2777320 Page 7 |
|-------------------------|-----------|---|--|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| 9/24/20 | AG | Court Mandated Conferences: Communicate (Other External): Email to plaintiffs' counsel outlining position regarding authorizations for plaintiffs' medical records. | .2 |
| 9/24/20 | AG | Court Mandated Conferences: Plan & Prepare For: Review and analyze plaintiff Isaiah Khosrof's responses to interrogatories in preparation for EDCR 2.34 conference call requested by plaintiff's counsel for purposes of determining pre-existing injuries as justification for medical authorizations. | .3 |
| 9/24/20 | AG | Court Mandated Conferences: Plan & Prepare For: Review and analyze plaintiff Lloyd Creecy's responses to interrogatories in preparation for EDCR 2.34 conference call requested by plaintiff's counsel for purposes of determining pre-existing injuries as justification for medical authorizations. | .3 |
| 9/24/20 | AG | Court Mandated Conferences: Plan & Prepare For: Review and analyze plaintiff estate's responses to interrogatories in preparation for EDCR 2.34 conference call requested by plaintiff's counsel for purposes of determining pre-existing injuries as justification for medical authorizations. | .4 |
| 9/24/20 | AG | Court Mandated Conferences: Review/Analyze: Review and analyze email from plaintiff's counsel regarding our position on medical authorizations. | .1 |
| 9/25/20 | AG | Dispositive Motions: Draft/Revise: Continue drafting reply to plaintiff's opposition to CHH's motion for summary judgment to include additional case authority on applicability of medical malpractice statute of limitations to any additional claims which directly stem therefrom. | 2.7 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|---|-------|------|----------|
| 9/15/20 | Court filing fee Comerica Commercial Card Services Inv#:083120STMT-ANOUWELS Trans Date: 08/10/2020 Nvefile* 006448171-0, Filing fee for non opposition. | | | 3.50 |
| 9/15/20 | E123-Consulting Services Ruffalo & Associates, Inc. Inv#:2449 Professional services rendered on 09/10/20. | | | 1,800.00 |
| 9/17/20 | Medical Expert Services Abraham Ishaaya Inv#:#2POWELL Expert medical services rendered on 09/13/20 - 09/15/20. | | | 1,375.00 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|--------------|----------------|------------------|
| Arielle Atkinson | 21.5 | 90.00 | 1,935.00 |
| Adam Garth | 63.2 | 225.00 | 14,220.00 |
| S. Brent Vogel | 15.5 | 225.00 | 3,487.50 |
| Total | 100.2 | | 19,642.50 |

| | |
|----------------------------|------------------|
| Total Fees | 19,642.50 |
| Total Disbursements | 3,178.50 |

| | |
|------------------------------|---------------------|
| Total Current Charges | \$ 22,821.00 |
|------------------------------|---------------------|

Case # A-19-788787-C - Estate of Rebecca Powell, Plaintiff**Envelope Information****Envelope Id**

6448171

Submitted Date

8/10/2020 3:05 PM PST

Submitted User Name

roya.rokni@lewisbrisbois.com

Case Information**Location**

Department 30

Category

Civil

Case Type

Malpractice - Medical/Dental

Case Initiation Date

2/4/2019

Case #

A-19-788787-C

Assigned to Judge

Wiese, Jerry A.

Filings**Filing Type**

EFileAndServe

Filing Code

Non Opposition - NONO (CIV)

Filing Description

Defendants Valley Health Systems'
Non-Opposition to Defendant
Juliano's Motion for Summary
Judgment and Joinder to
Defendant Concio and Shah's
Motion for Partial Summary
Judgment

Client Reference Number

28094-190

Filing on Behalf of

Valley Health System, LLC

Filing Status

Accepted

Accepted Date

8/10/2020 3:07 PM PST

Accept Comments

Auto Review Accepted

Lead Document**File Name****Description****Security**

Public Filed Document

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Powell - CHH's Non-Opposition &
Joinder to Co-Defendants' Motion
for Summary Judgment 4820-
8468-7815 v.pdf

Non Opposition -
NONO (CIV)

Original File
Court Copy

eService Details

| Status | Name | Firm | Served | Date Opened |
|--------|----------------------|-------------------------------------|--------|---------------------|
| Sent | Paul S. Padda | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | Tony L. Abbatangelo | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | James P. Kelly | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | Paul Padda | Paul Padda Law, PLLC | Yes | Not Opened |
| Sent | Marlenne Casillas | PAUL PADDA LAW, PLLC | Yes | 8/11/2020 9:00 AM P |
| Sent | Jennifer C. Greening | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | S. Brent Vogel | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Johana Whitbeck | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Adam Garth | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Roya Rokni | Lewis Brisbois Bisgaard & Smith LLP | Yes | 8/10/2020 3:27 PM P |
| Sent | Arielle Atkinson | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Jody Foote | John H. Cotton & Associates, Ltd. | Yes | 8/10/2020 4:52 PM P |
| Sent | Jessica D. Pincombe | John H. Cotton & Associates, Ltd. | Yes | 8/10/2020 3:07 PM P |
| Sent | John H. Cotton | John H. Cotton & Associates, Ltd. | Yes | Not Opened |
| Sent | Brad Shipley | John H. Cotton & Associates, Ltd. | Yes | 8/10/2020 3:07 PM P |

Parties with No eService

Name **Address**

Isaiah Khosrof

Name **Address**

Lloyd Creecy

Name **Address**

Taryn Creecy

Name **Address**

Darci Creecy

Name **Address**

<https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnVELO...> 8/26/2020

Dionice S. Juliano MD

| Name | Address |
|-------------------|---------|
| Vishal S. Shah MD | |

| Name | Address |
|--------------|---------|
| Brian Powell | |

Fees

Non Opposition - NONO (CIV)

| Description | Amount |
|----------------------|---------------|
| Filing Fee | \$0.00 |
| Filing Total: | \$0.00 |

| | |
|------------------------|---------------|
| Total Filing Fee | \$0.00 |
| E-File Fee | \$3.50 |
| Envelope Total: | \$3.50 |

| | | | |
|-----------------------------------|-----------------------|---------------------------|---------|
| Party Responsible for Fees | Valley Health Syst... | Transaction Amount | \$3.50 |
| Payment Account | Autumn Nouwels | Transaction Id | 7582211 |
| Order Id | 006448171-0 | | |
| Transaction Response | Payment Complete | | |

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RUFFALO & ASSOCIATES, INC

RECEIVED

SEP 21 2020

Invoice #: 2449
Invoice Date: 9/15/2020
Terms: Net 30

| | | |
|--|------|------------|
| RE: POWELL V. CENTENNIAL HILLS HOSPITAL, ET AL | | |
| Review of the decedent's autopsy report and toxicology report and analysis of the toxicology report regarding drug-drug interactions | 1.25 | 750.00 |
| Review of the plaintiff's letter to the Nevada State Nursing Board and the nursing boards report and comparison with the medical records | 1.25 | 750.00 |
| Discussion with Mr. Garth 09/10/2020 | 0.5 | 300.00 |
| TOTAL HOURS: 3.0 | | |
| Total | | \$1,800.00 |
| Payments/Credits | | \$0.00 |
| Balance Due | | \$1,800.00 |

\$1,800.00

Abraham Ishaaya, M.D., F.C.C.P.

RECEIVED

SEP 18 2020

September 17, 2020

#2POWELL

LEWIS BRISBOIS
ATT: Adam Garth
6385 South Rainbow Blvd., Suite 600
Las Vegas, NV 89118

RE: CASE NAME: Estate of Rebecca Powell v Centennial Hills Hospital

Dear Adam:

Enclosed please find my charges to present for the above case.

Review of:

| | | |
|------|---------------------------------|-----------|
| 9-13 | Coroner/Medical Examiner report | 1.1 hours |
| | DHHS review | 1.2 hours |
| 9-15 | Telephone call | .2 hours |

Total hours: 2.5 hours @ \$550

Total owed: \$1,375

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,



Avi Ishaaya, M.D.

LEWIS BRISBOIS BISGAARD & SMITH LLP

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633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

November 13, 2020
Invoice No. 2808914

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

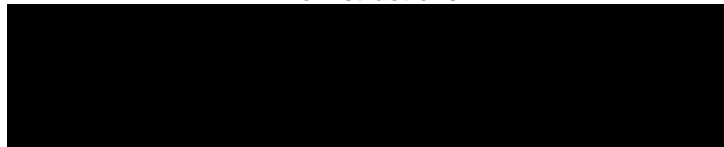
Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 10/31/20 | 12,559.50 |
| Current Disbursements through 10/31/20 | 209.50 |
| Total Current Charges | \$ 12,769.00 |

*** Please return this page with your payment. ***

Retainer Balance 104.40

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

November 13, 2020
Invoice No. 2808914

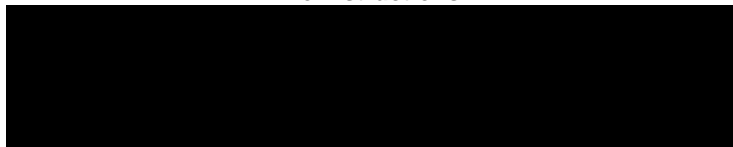
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 10/31/20 | 12,559.50 |
| Current Disbursements through 10/31/20 | 209.50 |
| Total Current Charges | \$ 12,769.00 |

Retainer Balance 104.40

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|--|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 11/13/20 2808914 Page 1 |
|-------------------------|------------------|---|--|

| Date | Atty | Description of Services Rendered | Hours |
|----------|------|--|-------|
| 10/01/20 | AA | Fact Investigation/Development: Review/Analyze: Detailed legal analysis of Plaintiff's Second Supplement 16.1 Disclosure in order to establish a running list of additional witnesses and documents that may need additional discovery inquiry to continue to build defense in Powell v Centennial Hills Hospital (300 of 1230 pgs). | .5 |
| 10/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff estate's supplementary responses to interrogatories (36 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information attendant thereto. | .7 |
| 10/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Darci Creecy's supplementary responses to interrogatories (36 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information attendant thereto. | .7 |
| 10/01/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff estate's supplementary responses to requests for production of documents (93 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional documents and materials attendant thereto. | 1.0 |
| 10/01/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Taryn Creecy's supplementary responses to requests for production of documents (87 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information and documents attendant thereto. | .8 |
| 10/01/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Lloyd Creecy's supplementary responses to requests for production of documents (86 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information and documents attendant thereto. | .8 |
| 10/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Isaiah Khosrof's supplementary responses to interrogatories (33 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information attendant thereto. | .6 |
| 10/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff estate's supplementary responses to special interrogatories (21 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information attendant thereto. | .5 |
| 10/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Lloyd Creecy's supplementary responses to interrogatories (32 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information attendant thereto. | .6 |
| 10/01/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Darci Creecy's supplementary responses to requests for production of documents (90 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information and documents attendant thereto. | .9 |
| 10/01/20 | AG | Document Production: Review/Analyze: Review and analyze plaintiff Isaiah Khosrof's supplementary responses to requests for production of documents (86 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information and documents attendant thereto. | .8 |

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FEDERAL I.D. NO 95-3720522

| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 11/13/20 2808914 Page 2 |
|---------------------|-----------|---|-------------------------------|
| Date | Atty | Description of Services Rendered | Hours |
| 10/01/20 | AG | Written Discovery: Review/Analyze: Review and analyze plaintiff Taryn Creecy's supplementary responses to interrogatories (35 pages) for purposes of determining propriety of responses, comparing to previous responses and determining extent to which motion to compel is required to obtain additional information attendant thereto. | .7 |
| 10/01/20 | SBV | Written Discovery: Review/Analyze: Analyze plaintiffs' supplemental responses to requests for production, four sets | 1.2 |
| 10/01/20 | SBV | Document Production: Review/Analyze: Begin review and analysis of records in plaintiff's second supplement to disclosure statement including Medical Care Now and CHH for comparison with client records | 2.8 |
| 10/02/20 | AA | Fact Investigation/Development: Review/Analyze: Detailed legal analysis of Plaintiff's Second Supplement 16.1 Disclosure in order to establish a running list of additional witnesses and documents that may need additional discovery inquiry to continue to build defense in Powell v Centennial Hills Hospital (300 of 1230 pgs). | .5 |
| 10/02/20 | AG | Dispositive Motions: Research: Perform additional legal research based upon recent issuance of Nevada Supreme Court decision pertaining to inquiry notice and running of statute of limitations for purposes of incorporating same into reply to plaintiff's opposition to motion for summary judgment. | .6 |
| 10/02/20 | AG | Dispositive Motions: Draft/Revise: Continued revisions to reply on our motion for summary judgment incorporating latest opinion and legal analysis of Nevada Supreme Court's decision pertaining to inquiry notice on statute of limitations. | 1.8 |
| 10/05/20 | AA | Fact Investigation/Development: Review/Analyze: Detailed legal analysis of Plaintiff's Second Supplement 16.1 Disclosure in order to establish a running list of additional witnesses and documents that may need additional discovery inquiry to continue to build defense in Powell v Centennial Hills Hospital (300 of 1230 pgs). | .5 |
| 10/06/20 | AA | Fact Investigation/Development: Review/Analyze: Detailed legal analysis of Plaintiff's Second Supplement 16.1 Disclosure in order to establish a running list of additional witnesses and documents that may need additional discovery inquiry to continue to build defense in Powell v Centennial Hills Hospital (330 of 1230 pgs). | .5 |
| 10/08/20 | AA | Fact Investigation/Development: Draft/Revise: Detailed analysis of Centennial Hills Hospital records received in Plaintiff's Second Supplement 16.1 Disclosure of plaintiff, Rebecca Powell, to draft medical event history for attorney, Adam Garth, to establish order of events, compose list medical providers, illuminate any/all incidents related to allegations against defendant, which may impact outcome of case, and identify any health information subject to investigation or deserving attorney attention (599 of 1230 pages)." | 6.2 |
| 10/09/20 | AA | Fact Investigation/Development: Draft/Revise: Detailed analysis of Centennial Hills Hospital records received in Plaintiff's Second Supplement 16.1 Disclosure of plaintiff, Rebecca Powell, to draft medical event history for attorney, Adam Garth, to establish order of events, compose list medical providers, illuminate any/all incidents related to allegations against defendant, which may impact outcome of case, and identify any health information subject to investigation or deserving attorney attention (631 of 1230 pages). | 6.5 |
| 10/12/20 | SBV | Written Discovery: Review/Analyze: Analyze correspondence from plaintiff's counsel regarding discovery responses and verifications | .2 |
| 10/14/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Telephone call with co-defense counsel to develop combined strategy to oppose plaintiff's countermotion to amend requests for admission responses and his opposition to co-defendant's countermotion for summary judgment on negligent infliction of emotional distress claims. | .8 |
| 10/14/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze plaintiff's opposition to co-defendant's countermotion for summary judgment on NIED claims and plaintiff's | |

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FEDERAL I.D. NO 95-3720522

| | | | |
|-----------------------------|------------------|---|--|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 11/13/20 2808914 Page 3 |
|-----------------------------|------------------|---|--|

| Date | Atty | Description of Services Rendered | Hours |
|----------|------|--|-------|
| | | countermotion to amend or withdraw his lack of responses to requests (107 pages) for admission for purposes of preparing opposition to countermotion and reply to opposition interposed by plaintiff. | 2.3 |
| 10/14/20 | AG | Dispositive Motions: Research: Perform legal research on plaintiff's opposition to co0-defendant's motion for summary judgment and countermotion to withdraw responses to requests for admission for purposes of checking all of the case citations utilized by plaintiff for accuracy and to develop counterarguments thereto. | 2.8 |
| 10/14/20 | AG | Dispositive Motions: Draft/Revise: Begin drafting opposition to plaintiffs' countermotion to amend or withdraw responses to requests for admission and reply to opposition to co-defendant's motion for summary judgment. | 3.3 |
| 10/15/20 | AG | Dispositive Motions: Draft/Revise: Continue preparation of our reply to plaintiffs' opposition to co-defendants' motion for summary judgment on negligent infliction of emotional distress claims and our opposition to plaintiffs' countermotion to amend or withdraw responses to requests for admissions served by co-defendants. | 6.2 |
| 10/16/20 | SBV | Dispositive Motions: Review/Analyze: Analyze plaintiffs' opposition to motion for summary and counter motion to amend or withdraw responses to RFA's and cited case law (100+ pages) | 2.8 |
| 10/20/20 | AG | Dispositive Motions: Draft/Revise: Continue preparation of and finalize our reply to plaintiff's opposition to our motion for summary judgment on statute of limitations. | 1.2 |
| 10/20/20 | AG | Dispositive Motions: Draft/Revise: Continue preparation of an finalize our reply to plaintiff's opposition to co-defendant's motion for summary judgment on negligent infliction of emotional distress claims (in further support of our joinder) and in opposition to plaintiff's countermotion to amend or withdraw his responses to requests for admission. | 1.4 |
| 10/20/20 | SBV | Dispositive Motions: Draft/Revise: Edit and finalize reply in support of motion for summary judgment | .9 |
| 10/21/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Teleconference with co-defense counsel to plan strategy for oral argument on respective summary judgment motions. | .5 |
| 10/21/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze co-defendant's joinder to our reply to plaintiff's opposition to co-defendant's motion for summary judgment on negligent infliction of emotional distress claims and countermotion to withdraw or amend responses to requests for admission. | .1 |
| 10/21/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze co-defendant's reply to plaintiff's opposition to co-defendant's motion for summary judgment on negligent infliction of emotional distress claims and countermotion to withdraw or amend responses to requests for admission. | .4 |
| 10/21/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze co-defendant's joinder to our reply to plaintiff's opposition to our motion for summary judgment. | .2 |
| 10/21/20 | SBV | Dispositive Motions: Review/Analyze: Analyze co-defendants' joinder in our reply in support of motion for summary judgment | .2 |
| 10/21/20 | SBV | Dispositive Motions: Review/Analyze: Analyze co-defendant's reply in support of motion for summary judgment and partial summary judgment on emotional distress claims and cases cited therein | .7 |
| 10/26/20 | AG | Dispositive Motions: Plan & Prepare For: Prepare for oral argument and hearing on motions for summary judgment by reviewing and analyzing our motion for summary judgment and exhibits annexed thereto (154 pages) and preparing outline for same. | 3.6 |
| 10/26/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze plaintiff's counsel's email requesting continuance of hearing on motions for summary judgment due to illness. | .1 |
| 10/26/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare ex parte application to strike | |

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
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LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|--|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 11/13/20 2808914 Page 4 |
|-------------------------|------------------|---|--|

| Date | Atty | Description of Services Rendered | Hours |
|----------|------|---|-------|
| | | document with identifying information and substitute redacted document in support of motion for summary judgment and order granting same. | 1.4 |
| 10/26/20 | JD | Dispositive Motions: Draft/Revise: Revised Centennial Hills Hospital's Motion for Summary Judgment by removing any/all privileged information of decedent. | .1 |
| 10/27/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Teleconference with co-defense counsel regarding strategy for postponed hearing on respective motions for summary judgment. | .3 |
| 10/27/20 | AG | Dispositive Motions: Plan & Prepare For: Continue preparation of outline for oral argument and hearing on our motion for summary judgment on statute of limitations and co-defendant's motion for summary judgment on negligent infliction of emotional distress claims, and plaintiff's countermotion to amend or withdraw responses to requests for admissions. | 2.6 |
| 10/27/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze court order continuing hearing on all pending motions for summary judgment for one week. | .1 |
| 10/28/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze court order permitting substitution of conforming evidence pages in motion for summary judgment. | .1 |
| 10/28/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare notice of entry of court order granting substitution of non-conforming exhibits. | .3 |
| 10/29/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze court's written decision on all pending motions for summary judgment and vacating hearing now scheduled for November 4 for purposes of determining outcome and devising future litigation strategy. | .3 |
| 10/29/20 | AG | Dispositive Motions: Communicate (With Client): Email to R. Kim along with copy of decision on motions for summary judgment along with analysis thereof and request for authorization to pursue a writ with the Nevada Supreme Court. | .5 |
| 10/29/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Phone call from co-defense counsel to discuss further potential discovery strategy to obtain additional evidence to attach to potential renewal motion prior to filing for writ before Nevada Supreme Court. | 1.4 |
| 10/29/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Telephone call with co-defense counsel to prepare strategy regarding appeal of motions for summary judgment | .4 |
| 10/29/20 | SBV | Dispositive Motions: Review/Analyze: Analyze court's order denying our MSJ | .3 |

| Date | Description of Disbursement | Units | Rate | Amount |
|----------|--|-------|------|--------|
| 10/15/20 | Court filing fee Comerica Commercial Card Services Inv#:093020STMT-ANOUWELS Trans Date: 09/02/2020 Nvefile* 006565123-0, Filing fee for Valley Health System, LLC and Universal Health Services, Inc.'s motion for summary judgment based upon the expiration of the statute of limitations. | | | 209.50 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|------------------|
| Arielle Atkinson | 14.7 | 90.00 | 1,323.00 |
| Adam Garth | 40.8 | 225.00 | 9,180.00 |
| Joshua Daor | .1 | 90.00 | 9.00 |
| S. Brent Vogel | 9.1 | 225.00 | 2,047.50 |
| Total | 64.7 | | 12,559.50 |

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FEDERAL I.D. NO 95-3720522

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|------------------------|-----------|---|--------------------------|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 11/13/20 2808914 5 |
| | | | Page |

| Date | Description of Disbursement | Units | Rate | Amount |
|------|-----------------------------|-------|------|--------|
|------|-----------------------------|-------|------|--------|

| | |
|---------------------|-----------|
| Total Fees | 12,559.50 |
| Total Disbursements | 209.50 |

| | |
|-----------------------|--------------|
| Total Current Charges | \$ 12,769.00 |
|-----------------------|--------------|

Case # A-19-788787-C - Estate of Rebecca Powell, Plaintiff**Envelope Information**

Envelope Id
6565123

Submitted Date
9/2/2020 10:04 AM PST

Submitted User Name
roya.rokni@lewisbrisbois.com

Case Information

Location
Department 30

Category
Civil

Case Type
Malpractice - Medical/Dental

Case Initiation Date
2/4/2019

Case #
A-19-788787-C

Assigned to Judge
Wiese, Jerry A.

Filings

Filing Type
EFileAndServe

Filing Code
Motion for Summary Judgment -
MSJD (CIV)

Filing Description

Valley Health System, LLC And
Universal Health Services, Inc.'s
Motion For Summary Judgment
Based Upon The Expiration Of The
Statute Of Limitations

Client Reference Number
28094-190

Filing on Behalf of
Valley Health System, LLC

Filing Status
Accepted

Accepted Date
9/2/2020 10:07 AM PST

Accept Comments
Auto Review Accepted

Lead Document

| File Name | Security | Download |
|-----------|-----------------------|-----------------------------|
| | Public Filed Document | Original File Court Copy |

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Powell v Valley -CHH's Motion for
Summary Judgment 4818-7403-
4121 v.pdf

eService Details

| Status | Name | Firm | Served | Date Opened |
|--------|----------------------|-------------------------------------|--------|----------------------|
| Sent | Paul S. Padda | PAUL PADDA LAW, PLLC | Yes | 9/2/2020 10:17 AM PS |
| Sent | Tony L. Abbatangelo | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | James P. Kelly | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | Paul Padda | Paul Padda Law, PLLC | Yes | Not Opened |
| Sent | Marlene Casillas | PAUL PADDA LAW, PLLC | Yes | 9/2/2020 12:33 PM PS |
| Sent | Jennifer C. Greening | PAUL PADDA LAW, PLLC | Yes | 9/15/2020 5:27 PM PS |
| Sent | S. Brent Vogel | Lewis Brisbois Bisgaard & Smith LLP | Yes | 9/2/2020 10:08 AM PS |
| Sent | Johana Whitbeck | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Adam Garth | Lewis Brisbois Bisgaard & Smith LLP | Yes | 9/2/2020 10:52 AM PS |
| Sent | Roya Rokni | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Arielle Atkinson | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Jody Foote | John H. Cotton & Associates, Ltd. | Yes | 9/2/2020 4:40 PM PS |
| Sent | Jessica D. Pincombe | John H. Cotton & Associates, Ltd. | Yes | 9/2/2020 10:22 AM PS |
| Sent | John H. Cotton | John H. Cotton & Associates, Ltd. | Yes | Not Opened |
| Sent | Brad Shipley | John H. Cotton & Associates, Ltd. | Yes | 9/3/2020 12:09 PM PS |

Parties with No eService

Name **Address**
Isaiah Khosrof

Name **Address**
Lloyd Creecy

Name **Address**
Taryn Creecy

Name **Address**
Darci Creecy

Name **Address**
Dionice S. Juliano MD

<https://nevada.tylerhost.net/OfsWeb/FileAndServeModule/Envelope/ViewPrintableEnVELO...> 9/17/2020

Name **Address**
Vishal S. Shah MD

Name **Address**
Brian Powell

Fees

Motion for Summary Judgment - MSJD (CIV)

| Description | Amount |
|----------------------|-----------------|
| Filing Fee | \$200.00 |
| Filing Total: | \$200.00 |

| | |
|------------------------|-----------------|
| Total Filing Fee | \$200.00 |
| Payment Service Fee | \$6.00 |
| E-File Fee | \$3.50 |
| Envelope Total: | \$209.50 |

| | | | |
|-----------------------------------|-----------------------|---------------------------|----------|
| Party Responsible for Fees | Valley Health Syst... | Transaction Amount | \$209.50 |
| Payment Account | Autumn Nouwels | Transaction Id | 7699473 |
| Order Id | 006565123-0 | | |
| Transaction Response | Payment Complete | | |

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

December 10, 2020
Invoice No. 2836962

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

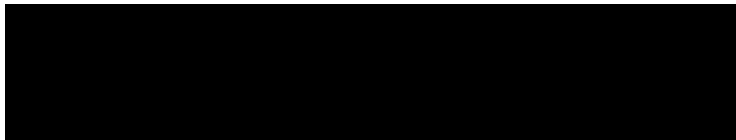
Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 11/30/20 | 14,392.80 |
| Current Disbursements through 11/30/20 | 14.00 |
| Total Current Charges | \$ 14,406.80 |

*** Please return this page with your payment. ***

Retainer Balance 104.40

Wire Instructions



All Charges in US Dollars

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

December 10, 2020
Invoice No. 2836962

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 11/30/20 | 14,392.80 |
| Current Disbursements through 11/30/20 | 14.00 |
| Total Current Charges | \$ 14,406.80 |

Retainer Balance 104.40

Wire Instructions

Comerica Bank
Account Name: Lewis, Brisbois, Bisgaard & Smith, LLP
Account No.: 1891462440
ABA Routing No.: 121137522
SWIFT A/C No.: MNBDUS33

All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 12/10/20 2836962 Page 1 |
|---------------------|-----------|---|-------------------------------|
| Date | Atty | Description of Services Rendered | Hours |
| 11/02/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Begin preparation of application for stay of proceedings to permit writ to Nevada Supreme Court regarding denial of our motion for summary judgment on expiration of the statute of limitations. | 6.7 |
| 11/02/20 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Telephone call from co-defense counsel to discuss strategy regarding further discovery prior to petitioning for writ to Nevada Supreme Court regarding denial of our motion to summary judgment on statute of limitations and proceeding further therewith. | .9 |
| 11/02/20 | AG | Other Written Motions & Submiss.: Research: Conduct legal research to obtain latest case law regarding obtaining a stay at the district court prior to seeking writ before Nevada Supreme Court as required by appellate rules. | 1.3 |
| 11/02/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare notice of entry of order denying motion for summary judgment. | .2 |
| 11/03/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze email from plaintiff's counsel to court regarding need for time to oppose our motion for stay pending writ to appeal to Nevada Supreme Court. | .1 |
| 11/03/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Continue preparation of motion for stay pending writ to Nevada Supreme Court. | 3.7 |
| 11/04/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Letter to plaintiff's counsel regarding hearing on our motion for stay application pertaining to writ to Nevada Supreme Court. | .2 |
| 11/04/20 | AG | Appellate Motions & Submissions: Draft/Revise: Begin preparation of writ petition to Nevada Supreme Court regarding District Court's denial of motion for summary judgment on statute of limitations. | 6.4 |
| 11/05/20 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation of extensive writ petition to Nevada Supreme Court regarding denial of our motion for summary judgment on statute of limitations. | 5.6 |
| 11/06/20 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation of writ petition to Nevada Supreme Court. | 5.3 |
| 11/09/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Continue preparation of writ application to Nevada Supreme Court based upon denial of motion for summary judgment. | 1.6 |
| 11/12/20 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation of writ petition to Nevada Supreme Court regarding denial of motion for summary judgment on statute of limitations. | 4.2 |
| 11/18/20 | AG | Written Motions and Submissions: Plan & Prepare For: Begin preparing for hearing on our motion for stay application pertaining to denial of our motion for summary judgment on statute of limitations by beginning to prepare outline of said application (340 pages). | 1.6 |
| 11/19/20 | AG | Written Discovery: Communicate (With Client): Email to A. Nichols regarding needed responses to interrogatories and requests for production of documents as well a strategy pertaining thereto. | .3 |
| 11/19/20 | HA | "No Charge": Appear For/Attend: Telephone meeting with Adam Garth to discuss strategy for providing responses to Plaintiff's written discovery requests. | .5 |
| 11/19/20 | HA | Written Discovery: Review/Analyze: Review/analyze Plaintiff's interrogatories (40) and requests for production (81) to Centennial Hills Hospital in preparation to respond and interpose appropriate objections to same. | 1.8 |
| 11/19/20 | HA | Written Discovery: Research: Legal research on latest case law on interposing objections to written discovery requests. | 1.5 |
| 11/19/20 | SBV | Other Written Motions & Submiss.: Review/Analyze: Analyze plaintiff's opposition to motion to stay and cited cases | .8 |
| 11/19/20 | SBV | Written Discovery: Review/Analyze: Analyze plaintiff's interrogatories to Valley Health | .4 |

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FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|--|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 12/10/20 2836962 Page 2 |
|-------------------------|------------------|---|--|

| Date | Atty | Description of Services Rendered | Hours |
|----------|------|---|-------|
| 11/19/20 | SBV | Written Discovery: Review/Analyze: Analyze plaintiff's requests for production to Valley Health | .4 |
| 11/20/20 | AG | Other Written Motions & Submiss.: Research: Legal research to check all cases cited by plaintiff in opposition to our stay application for purposes of preparing reply thereto and to obtain contradictory authority in further support of our motion in light of said opposition. | 1.1 |
| 11/20/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare reply to plaintiffs' opposition to our motion for stay application pertaining to our motion for summary judgment and writ to the Supreme Court. | 3.6 |
| 11/20/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze plaintiff's opposition to our motion for stay for purposes of preparing reply thereto | .8 |
| 11/20/20 | HA | Written Discovery: Draft/Revise: Commence drafting responses and objections to Plaintiffs' Interrogatories, including review of medical record to provide responses compliant with requirement to provide references to specific bates-stamped entries. | 2.0 |
| 11/20/20 | HA | Written Discovery: Review/Analyze: Review/analyze Plaintiff's NRCP 16.1 disclosures in preparation to respond to Plaintiff's written discovery requests, some of which concern matters discussed in Plaintiff's disclosed documents. | .8 |
| 11/20/20 | HA | Written Discovery: Draft/Revise: Commence drafting responses and objections to Plaintiffs' requests for production of documents including review of medical record to provide responses compliant with requirement to provide references to specific bates-stamped entries.. | 2.8 |
| 11/20/20 | HA | Written Discovery: Review/Analyze: Review/analyze Judge Weise's recent order denying Defendants' motion for summary judgment in preparation to respond to Plaintiff's written discovery requests, some of which concern matters resolved in the court's order. | .3 |
| 11/20/20 | SBV | Other Written Motions & Submiss.: Draft/Revise: Edit and finalize Reply in Support of Motion for Stay | .6 |
| 11/23/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare outline for hearing on our motion for stay of all proceedings pending writ to Nevada Supreme Court due to denial of our motion for summary judgment on statute of limitations. | 1.3 |
| 11/23/20 | AG | Other Written Motions & Submiss.: Plan & Prepare For: Continued review and analyze our motion for stay pending writ to Nevada Supreme Court (approximately 340 pages) in preparation for hearing on said motion and for purposes of creating outline therefrom. | 1.8 |
| 11/23/20 | AG | Other Written Motions & Submiss.: Communicate (Other Outside Counsel): Teleconference with codefense counsel regarding status of hearing on our stay application. | .1 |
| 11/23/20 | AG | Other Written Motions & Submiss.: Plan & Prepare For: Review and analyze our reply to plaintiff's opposition to our motion for stay in preparation for hearing thereon. | .7 |
| 11/23/20 | AG | Other Written Motions & Submiss.: Communicate (Other External): Communicate with and review response from court regarding hearing on stay application. | .2 |
| 11/23/20 | AG | Other Written Motions & Submiss.: Plan & Prepare For: Continued review and analysis of plaintiffs' opposition to our motion for stay in preparation for hearing on same. | .4 |
| 11/23/20 | HA | Written Discovery: Draft/Revise: Continue drafting responses and objections to Plaintiffs' Interrogatories and requests for production, including review of medical record to provide responses compliant with requirement to provide references to specific bates-stamped entries. | 1.6 |
| 11/30/20 | AG | Dispositive Motions: Review/Analyze: Review and analyze plaintiff's proposed order denying our stay pending writ to Nevada Supreme Court and comparing same to the court's minute order to determine accuracy thereof. | .7 |
| 11/30/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare proposed counter order in compliance with court's decision denying our motion for stay due to inaccuracies with | |

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| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 12/10/20 2836962 Page 3 |
|-------------------------|------------------|---|--|

| Date | Atty | Description of Services Rendered | Hours |
|----------|------|---|-------|
| | | plaintiff's proposed order. | .6 |
| 11/30/20 | AG | Other Written Motions & Submiss.: Communicate (Other External): Email to all counsel along with proposed counter order pertaining to hearing on our motion for stay. | .1 |
| 11/30/20 | AG | Other Written Motions & Submiss.: Communicate (Other External): Review, analyze and respond to plaintiff's counsel's email regarding our proposed counter order and explanation of deficiencies of his proposed order. | .4 |
| 11/30/20 | HA | Written Discovery: Communicate (With Client): Review and respond to Amanda Nichols's email containing her initial responses to Plaintiff's written discovery requests. | .1 |
| 11/30/20 | HA | Written Discovery: Draft/Revise: Continue drafting responses and objections to Plaintiffs' Interrogatories, including review of medical record to provide responses compliant with requirement to provide references to specific bates-stamped entries and incorporating responses from Amanda Nichols. | 2.5 |
| 11/30/20 | HA | Written Discovery: Communicate (Other External): Prepare email correspondence with Paul Padda requesting extension of deadline to respond to written discovery. | .1 |
| 11/30/20 | HA | Written Discovery: Review/Analyze: Review/analyze initial written discovery responses from Amanda Nichols to determine how appropriately to incorporate that information into client's objections/responses. | .3 |

| Date | Description of Disbursement | Units | Rate | Amount |
|----------|---|-------|------|--------|
| 11/16/20 | Court filing fee Comerica Commercial Card Services Inv#:103120STMT-ANOUWELS Trans Date: 10/21/2020 Nvefile* 006809393-0, Filing fee for reply to opposition. | | | 3.50 |
| 11/16/20 | Court filing fee Comerica Commercial Card Services Inv#:103120STMT-ANOUWELS Trans Date: 10/26/2020 Nvefile* 006836433-0, Filing fee for defendants Valley Health System, LLC and Universal Health Services, Inc.'s amended ex parte application to strike non- conforming document pursuant to EDCR 8. 03 and replace non-conforming pages. | | | 3.50 |
| 11/16/20 | Court filing fee Comerica Commercial Card Services Inv#:103120STMT-ANOUWELS Trans Date: 10/26/2020 Nvefile* 006834234-0, Filing fee for defendants' application to strike non-conforming document pursuant to EDCR 8.03 and replace non-conforming document on defendants' motion for summary judgment based upon expiration of statute of limitations. | | | 3.50 |
| 11/16/20 | Court filing fee Comerica Commercial Card Services Inv#:103120STMT-ANOUWELS Trans Date: 10/28/2020 Nvefile* 006850481-0, Filing fee for notice of entry of order. | | | 3.50 |

| Recap of Services | Hours | Effective Rate | Fees |
|--------------------|-------------|----------------|------------------|
| Adam Garth | 49.9 | 225.00 | 11,227.50 |
| Heather Armantrout | .5 | | No Charge |
| | 13.8 | 193.50 | 2,670.30 |
| S. Brent Vogel | 2.2 | 225.00 | 495.00 |
| Total | 66.4 | | 14,392.80 |

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FEDERAL I.D. NO 95-3720522

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|------------------------|-----------|---|-------------------------------|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 12/10/20 2836962 Page 4 |
|------------------------|-----------|---|-------------------------------|

| Date | Description of Disbursement | Units | Rate | Amount |
|------|-----------------------------|-------|------|--------|
|------|-----------------------------|-------|------|--------|

| | |
|---------------------|-----------|
| Total Fees | 14,392.80 |
| Total Disbursements | 14.00 |

| | |
|-----------------------|--------------|
| Total Current Charges | \$ 14,406.80 |
|-----------------------|--------------|

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

January 12, 2021
Invoice No. 2853363

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

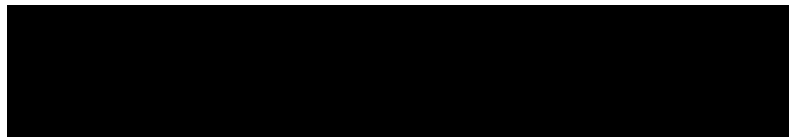
Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 12/31/20 | 3,690.00 |
| Current Disbursements through 12/31/20 | 7.00 |
| Total Current Charges | \$ 3,697.00 |

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Retainer Balance 104.40

Wire Instructions



All Charges in US Dollars

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

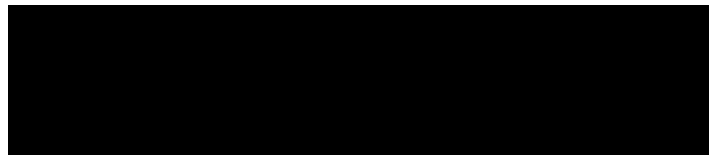
January 12, 2021
Invoice No. 2853363

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 12/31/20 | 3,690.00 |
| Current Disbursements through 12/31/20 | 7.00 |
| Total Current Charges | \$ 3,697.00 |

Retainer Balance 104.40



All Charges in US Dollars

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FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 1/12/21 2853363 Page 1 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|----------|------|--|-------|
| 12/01/20 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation of writ to Nevada Supreme Court regarding denial of our motion for summary judgment based upon statute of limitations including incorporation of results of hearing on our motion to stay pending decision on writ petition. | 2.4 |
| 12/04/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare letter to court with explanation of why we are submitting proposed order to court instead of plaintiff pertaining to stay application. | .4 |
| 12/09/20 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation of writ application to Nevada Supreme Court pertaining to denial of our motion for summary judgment on statute of limitations. | 2.6 |
| 12/16/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze email from the court regarding order submission pertaining to motion for summary judgment. | .2 |
| 12/17/20 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare notice of entry of order denying stay. | .3 |
| 12/17/20 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze court order denying stay application for purposes of incorporating same into writ petition | .2 |
| 12/17/20 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation of writ to Nevada Supreme Court regarding denial of motion for summary judgment on statute of limitations. | 1.7 |
| 12/21/20 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation of writ petition to Nevada Supreme Court regarding denial of motion for summary judgment on statute of limitations including preparation of multiple required disclosure documents in accordance with Nevada Rules of Appellate Procedure along with continued supplementation of brief with latest case law and analysis applicable to issues raised. | 6.3 |
| 12/22/20 | AG | Appellate Motions & Submissions: Draft/Revise: Continued preparation of writ petition to Nevada Supreme Court for purposes of finalizing same and preparing necessary affidavit of verification as well as all required documents for submission of same to court. | 2.3 |

| Date | Description of Disbursement | Units | Rate | Amount |
|----------|---|-------|------|--------|
| 12/14/20 | Court filing fee Comerica Commercial Card Services Inv#:113020STMT-ANOUWELS Trans Date: 11/02/2020 Nvefile* 006870224-0, Filing fee for notice of entry of order. | | | 3.50 |
| 12/14/20 | Court filing fee Comerica Commercial Card Services Inv#:113020STMT-ANOUWELS Trans Date: 11/20/2020 Nvefile* 006968470-0, Filing fee for defendant Valley Health System LLC's reply to plaintiff's opposition to motion for stay on order shortening time. | | | 3.50 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|-----------------|
| Adam Garth | 16.4 | 225.00 | 3,690.00 |
| Total | 16.4 | | 3,690.00 |

| | |
|----------------------------|-----------------|
| Total Fees | 3,690.00 |
| Total Disbursements | 7.00 |

| | |
|------------------------------|--------------------|
| Total Current Charges | \$ 3,697.00 |
|------------------------------|--------------------|

DISBURSEMENTS MADE FOR YOUR ACCOUNT, FOR WHICH BILLS HAVE NOT YET BEEN RECEIVED,
WILL APPEAR ON A LATER STATEMENT

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

February 10, 2021
Invoice No. 2885307

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

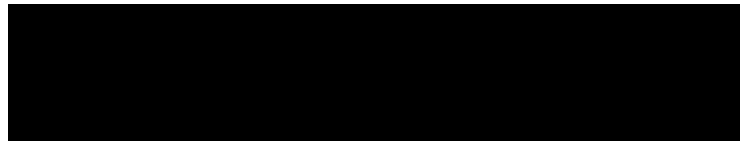
Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 01/31/21 | 4,449.00 |
| Current Disbursements through 01/31/21 | 253.50 |
| Total Current Charges | \$ 4,702.50 |

*** Please return this page with your payment. ***

Retainer Balance 104.40

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

February 10, 2021
Invoice No. 2885307

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 01/31/21 | 4,449.00 |
| Current Disbursements through 01/31/21 | 253.50 |
| Total Current Charges | \$ 4,702.50 |

Retainer Balance 104.40

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---------------------------------------|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 2/10/21 2885307 Page 1 |
|-------------------------|------------------|---|---------------------------------------|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| 1/05/21 | HA | Other Written Motions & Submiss.: Review/Analyze: Review/analyze minute order denying Motion to Dismiss in preparation to determine whether Plaintiff's draft Order accurately reflects the Court's findings and conclusions of law. | .3 |
| 1/08/21 | AG | Written Discovery: Draft/Revise: Continue preparation of plaintiff's interrogatories to Centennial Hills Hospital (40 interrogatories) including multiple legal objections thereto. | 1.7 |
| 1/08/21 | AG | Document Production: Draft/Revise: Continue preparation of responses to plaintiff's requests for production of documents (81 requests) to Centennial Hills Hospital including interposition of multiple legal objections thereto | 2.6 |
| 1/08/21 | HA | Written Discovery: Draft/Revise: Continue drafting responses to Plaintiff's requests for production of documents (81). | 2.3 |
| 1/08/21 | HA | Written Discovery: Draft/Revise: Continue drafting responses to Plaintiff's interrogatories (40). | 1.4 |
| 1/09/21 | HA | Written Discovery: Communicate (With Client): Prepare email correspondence with Amanda Nichols containing and explaining draft responses to Plaintiff's written discovery requesting review of same and providing documents for production with same. | .2 |
| 1/11/21 | HA | Written Discovery: Communicate (With Client): Review and respond to email correspondence with Richard Kim re: approval to draft and serve protective order regarding confidential and proprietary documents likely to be produced in responses to Plaintiff's written discovery requests. | .1 |
| 1/11/21 | HA | Written Discovery: Communicate (With Client): Prepare email correspondence with Richard Kim requesting authorization to draft and serve protective order regarding confidential and proprietary documents likely to be produced in responses to Plaintiff's written discovery requests. Approval granted. | .2 |
| 1/11/21 | HA | Written Discovery: Communicate (With Client): Draft email correspondence with Amanda Nichols confirming and clarifying contents of telephone conference re providing documents for production in Plaintiff's written discovery requests. | .2 |
| 1/11/21 | HA | Written Discovery: Draft/Revise: Revise responses to Plaintiff's written discovery requests in light of information and documents provided by Amanda Nichols. | 1.1 |
| 1/11/21 | HA | Written Discovery: Communicate (With Client): Telephone conference with Amanda Nichols re: providing documents for production in responses to Plaintiff's written discovery requests. | .2 |
| 1/11/21 | HA | Written Discovery: Review/Analyze: Review/analyze documents provided by Amanda Nichols to determine whether to produce in responses to Plaintiff's written discovery requests including various policies and procedures, incident reports, and medical staff bylaws. | .9 |
| 1/12/21 | AG | Written Discovery: Draft/Revise: Continue preparation of responses to plaintiff's interrogatories (40) including interposition of multiple legal objections. | .7 |
| 1/12/21 | AG | Document Production: Draft/Revise: Continue preparation of stipulated confidentiality agreement and protective order. | .3 |
| 1/12/21 | AG | Document Production: Draft/Revise: Continued preparation of and interposition of multiple legal objections to plaintiffs' requests for production of documents. | 1.7 |
| 1/12/21 | HA | Written Discovery: Draft/Revise: Draft privilege log for use with responses to Plaintiff's written discovery requests. | .2 |
| 1/12/21 | HA | Written Discovery: Draft/Revise: Draft proposed protective order to serve concurrent with responses to Plaintiff's written discovery requests. | .5 |
| 1/12/21 | HA | Written Discovery: Communicate (With Client): Review and respond to emails (x2) from Amanda Nichols containing documents for production in response to Plaintiff's written discovery requests. | .2 |
| 1/13/21 | AG | Dispositive Motions: Communicate (Other External): Email to plaintiff's counsel outlining detailed objections to proposed order pertaining to motions to dismiss and requesting revised proposed order. | .4 |

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FEDERAL I.D. NO 95-3720522

File Number 28094-190
SBV1

**UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills**

2/10/21
2885307
Page 2

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| 1/13/21 | AG | Dispositive Motions: Communicate (Other Outside Counsel): Telephone call with co-defense counsel regarding consolidated position and strategy pertaining to plaintiff's proposed order regarding disposition of motions to dismiss. | .9 |
| 1/13/21 | HA | Other Written Motions & Submiss.: Draft/Revise: Prepare brief memo to partner analyzing court's minute order denying motion to dismiss and comparing to Plaintiff's proposed order to the court to determine whether to approve same. | .3 |
| 1/15/21 | AG | Document Production: Draft/Revise: Continue preparation of responses to plaintiff's requests for production of documents including interposition of additional legal objections to same. | .9 |
| 1/15/21 | HA | Document Production: Review/Analyze: Review contents of imaging disc provided by Amanda Nichols to determine whether to produce same with responses to Plaintiff's written discovery requests. | .2 |
| 1/19/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Email to all counsel regarding stipulation to continue status check hearing. | .1 |
| 1/19/21 | AG | Court Mandated Conferences: Communicate (Other External): Email to all counsel regarding status check conference scheduled for January 27, 2021. | .1 |
| 1/19/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare stipulation and order to continue status check hearing pertaining to order regarding prior motions to dismiss. | .3 |
| 1/19/21 | HA | Written Discovery: Communicate (With Client): Prepare email correspondence with Amanda Nichols requesting final review and verification of answers to Plaintiff's interrogatories. | .1 |
| 1/19/21 | SBV | Written Discovery: Draft/Revise: Finalize interrogatories to estate | .3 |
| 1/19/21 | SBV | Written Discovery: Draft/Revise: Finalize requests for production to estate | .2 |
| 1/20/21 | HA | Written Discovery: Communicate (With Client): Review and respond to email correspondence with Amanda Nichols re providing completed interrogatory verification sheet. | .1 |
| 1/20/21 | HA | Written Discovery: Communicate (Other External): Prepare email correspondence with Plaintiff's counsel re providing interrogatory verification sheet. | .1 |
| 1/21/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare notice of entry of order pertaining to continuance of status check hearing regarding previously filed motions to dismiss. | .2 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|--|-------|------|--------|
| 1/15/21 | Court filing fee Comerica Commercial Card Services Inv#:123120STMT-ANOUWELS Trans Date: 12/17/2020 Nvfile* 007108178-0, Filing fee for notice of entry of order. | | | 3.50 |
| 1/15/21 | Court filing fee Comerica Commercial Card Services Inv#:123120STMT-ANOUWELS Trans Date: 12/23/2020 Nevada Supreme Court, Filing fee for petition for writ of mandamus. | | | 250.00 |

| Recap of Services | Hours | Effective Rate | Fees |
|--------------------|-------------|----------------|-----------------|
| Adam Garth | 9.9 | 250.00 | 2,475.00 |
| Heather Armantrout | 8.6 | 215.00 | 1,849.00 |
| S. Brent Vogel | .5 | 250.00 | 125.00 |
| Total | 19.0 | | 4,449.00 |

LEWIS BRISBOIS BISGAARD & SMITH LLP

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|------------------------|-----------|---|-------------------------|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 2/10/21 2885307 3 |
| | | | Page |

| Date | Description of Disbursement | Units | Rate | Amount |
|------|-----------------------------|-------|------|--------|
|------|-----------------------------|-------|------|--------|

| | |
|---------------------|----------|
| Total Fees | 4,449.00 |
| Total Disbursements | 253.50 |

| | |
|-----------------------|-------------|
| Total Current Charges | \$ 4,702.50 |
|-----------------------|-------------|

**Payment Results**

Transaction will not complete until you click the Exit button in the box below.

☐ I Agree

Thank You**Printable Receipt**

Merchant Location Code: 00001

Payment Status: Payment Success

Payment Date: 12/22/2020

Confirmation Number: 20122219695167

Billing Address: Autumn Nouwels
633 W. 5th Street
Suite 4000
Los Angeles, CA 90071
(702) 693-1707

E-Mail Address: Autumn.Nouwels@lewsibrisbois.com

Total Amount: 250.00 USD

Card Type: MC

Account #: x7095

Authorization Code: 050959

Exit

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28094-190

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

March 11, 2021
Invoice No. 2915500

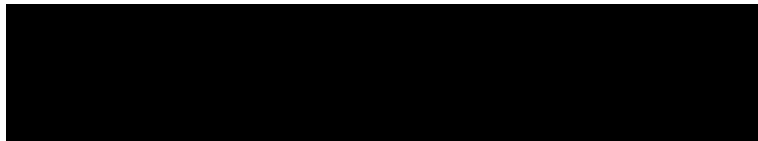
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 02/28/21 | 1,489.50 |
| Current Disbursements through 02/28/21 | 3.50 |
| Total Current Charges | \$ 1,493.00 |

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All Charges in US Dollars

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

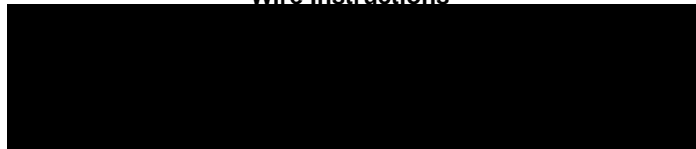
March 11, 2021
Invoice No. 2915500

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------------|
| Current Fees through 02/28/21 | 1,489.50 |
| Current Disbursements through 02/28/21 | 3.50 |
| Total Current Charges | <u>\$ 1,493.00</u> |

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
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633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 3/11/21 2915500 Page 1 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| 2/04/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Review, analyze and respond to email from plaintiff's counsel regarding further proposed order pertaining to motions to dismiss from 2019. | .2 |
| 2/04/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze transcript of proceedings pertaining to motions to dismiss decided in September 2019 for purposes of determining accuracy of plaintiff's proposed order denying said motion | .4 |
| 2/04/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Email to plaintiff's counsel approving of proposed order regarding denial of September 2019 motion to dismiss. | .1 |
| 2/04/21 | HA | Other Written Motions & Submiss.: Review/Analyze: Review and analyze Plaintiff's revised proposed order denying Motion to Dismiss, including review of transcript of hearing, to ascertain accuracy of Plaintiff's draft. Draft is accurate and can be filed. | .3 |
| 2/08/21 | AG | Analysis/Strategy: Communicate (With Client): Email to R. Kim regarding strategy on proceeding with discovery. | .1 |
| 2/08/21 | AG | Depositions: Communicate (Other External): Email to plaintiff's counsel regarding depositions of plaintiffs. | .1 |
| 2/08/21 | AG | Depositions: Communicate (Other Outside Counsel): Teleconference with co-defense counsel regarding strategy regarding depositions of plaintiffs and other possible individuals including coroner. | .5 |
| 2/09/21 | SBV | Dispositive Motions: Review/Analyze: Analyze order denying co-defendants' motion to dismiss | .2 |
| 2/16/21 | AG | Depositions: Communicate (Other External): Email to plaintiff's counsel regarding depositions of plaintiffs. | .1 |
| 2/16/21 | AG | Depositions: Review/Analyze: Review and analyze email from plaintiffs' counsel regarding depositions of plaintiffs. | .1 |
| 2/19/21 | AG | Analysis/Strategy: Communicate (With Client): Telephone call with R. Kim to discuss case strategy and possible mediation. | .8 |
| 2/19/21 | AG | Analysis/Strategy: Plan & Prepare For: Comprehensive case review of motion for summary judgment, expert reports, plaintiffs' discovery responses (interrogatories and requests for production of documents) for purposes of preparing for conference call with R. Kim to discuss case strategy. | 2.3 |
| 2/19/21 | AG | Depositions: Review/Analyze: Review and analyze email from plaintiff's counsel regarding plaintiff depositions. | .2 |
| 2/19/21 | AG | Settlement/Non-Binding ADR: Communicate (Other Outside Counsel): Email to co-defense counsel regarding possible mediation and strategy attendant thereto. | .2 |
| 2/19/21 | AG | Settlement/Non-Binding ADR: Communicate (Other Outside Counsel): Phone call from co-defense counsel regarding settlement/mediation strategy and discovery suspension issues. | .4 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|---|-------|------|--------|
| 2/12/21 | Court filing fee Comerica Commercial Card Services Inv#:013121STMT-ANOUWELS Trans Date: 01/21/2021 Nvefile* 007268304-0, Filing fee for notice of entry of order. | | | 3.50 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------|----------------|------|
|-------------------|-------|----------------|------|

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FEDERAL I.D. NO 95-3720522

File
Number
SBV1

28094-190

UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills

3/11/21
2915500
Page 2

| Recap of Services | Hours | Effective Rate | Fees |
|-----------------------|-------|----------------|-------------|
| Adam Garth | 5.5 | 250.00 | 1,375.00 |
| Heather Armantrout | .3 | 215.00 | 64.50 |
| S. Brent Vogel | .2 | 250.00 | 50.00 |
| Total | 6.0 | | 1,489.50 |
| Total Fees | | | 1,489.50 |
| Total Disbursements | | | 3.50 |
| Total Current Charges | | | \$ 1,493.00 |

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

April 9, 2021
Invoice No. 2936641

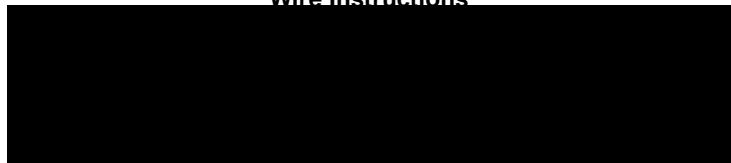
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|-------------------------------|-------------|
| Current Fees through 03/31/21 | 2,150.00 |
| Total Current Charges | \$ 2,150.00 |

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

April 9, 2021
Invoice No. 2936641

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|-------------------------------|-------------|
| Current Fees through 03/31/21 | 2,150.00 |
| Total Current Charges | \$ 2,150.00 |

Wire Instructions



All Charges in US Dollars

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FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 4/09/21 2936641 Page 1 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| 3/04/21 | AG | Analysis/Strategy: Draft/Revise: Begin preparation of summary report per request of R. Kim. | 1.6 |
| 3/04/21 | AG | Settlement/Non-Binding ADR: Communicate (Other Outside Counsel): Telephone call with co-defense counsel regarding mediation possibilities. | .1 |
| 3/04/21 | AG | Analysis/Strategy: Review/Analyze: Review and analyze email from R. Kim requesting summary analysis of case. | .1 |
| 3/11/21 | AG | Settlement/Non-Binding ADR: Communicate (Other Outside Counsel): Review, analyze and respond to co-defense counsel regarding possible mediation and strategy pertaining thereto in light of Supreme Court briefing schedule. | .1 |
| 3/11/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze Supreme Court order directing plaintiffs to file answer to our writ petition. | .1 |
| 3/11/21 | AG | Appellate Motions & Submissions: Communicate (With Client): Email to R. Kim regarding status of Supreme Court decision to hear matter pertaining to denial of our motion for summary judgment. | .2 |
| 3/11/21 | SBV | Other Written Motions & Submiss.: Review/Analyze: Analyze Notice of Appearance of appellate counsel for plaintiff | .1 |
| 3/26/21 | AG | Analysis/Strategy: Draft/Revise: Complete preparation of comprehensive evaluation report requested by R. Kim. | 3.7 |
| 3/26/21 | SBV | Analysis/Strategy: Draft/Revise: Edit and finalize case assessment report to client | .8 |
| 3/30/21 | SBV | Appellate Briefs: Review/Analyze: Analyze plaintiff's appellate brief in response and review of key cited cases | 1.8 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|------------|----------------|-----------------|
| Adam Garth | 5.9 | 250.00 | 1,475.00 |
| S. Brent Vogel | 2.7 | 250.00 | 675.00 |
| Total | 8.6 | | 2,150.00 |

| | |
|------------------------------|--------------------|
| Total Fees | 2,150.00 |
| Total Current Charges | \$ 2,150.00 |

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367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

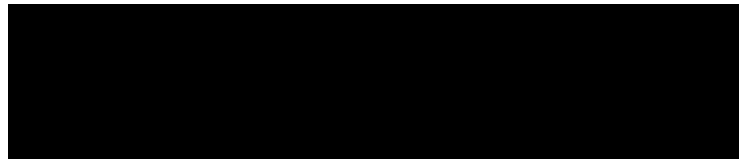
May 7, 2021
Invoice No. 2961882

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|-------------------------------|--------------|
| Current Fees through 04/30/21 | 11,200.00 |
| Total Current Charges | \$ 11,200.00 |

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FEDERAL I.D. NO 95-3720522

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367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

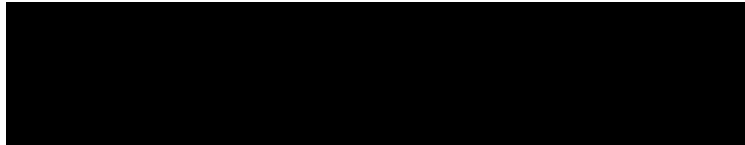
May 7, 2021
Invoice No. 2961882

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|-------------------------------|--------------|
| Current Fees through 04/30/21 | 11,200.00 |
| Total Current Charges | \$ 11,200.00 |

Wire Instructions



All Charges in US Dollars

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LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 5/07/21 2961882 Page 1 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| 4/02/21 | AG | Appellate Motions & Submissions: Research: Legal research on evidentiary obligations in opposition to motions for summary judgment for purposes of interposing same into reply brief in support of writ petition. | .6 |
| 4/02/21 | AG | Appellate Motions & Submissions: Research: Legal research stemming from plaintiffs' opposition to writ petition for purposes of cite checking said opposition to develop countervailing authority in reply | 1.8 |
| 4/02/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze plaintiffs' opposition to writ petition and appendices thereto (29 pages plus more than 300 pages of appendices) for purposes of preparing reply thereto | 1.6 |
| 4/02/21 | AG | Appellate Motions & Submissions: Draft/Revise: Begin drafting reply brief in further support of writ application on denial of motion for summary judgment and in reply to plaintiffs' opposition thereto. | 2.8 |
| 4/02/21 | SBV | Dispositive Motions: Review/Analyze: Analyze Order granting Khavkin Clinic's Motion to Dismiss | .2 |
| 4/05/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare motion to reconsider motion for stay of proceedings pending decision on writ petition on order shortening time. | 3.8 |
| 4/05/21 | AG | Depositions: Review/Analyze: Review and analyze plaintiffs' counsel's refusal to stipulate to stay discovery pending appeal to Nevada Supreme Court. | .1 |
| 4/05/21 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation of reply brief responding to plaintiffs' opposition to our petition for writ of mandamus. | 6.7 |
| 4/05/21 | SBV | Appellate Briefs: Draft/Revise: Edit Reply Brief regarding Petition for Writ of Mandamus | .7 |
| 4/06/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare application for order shortening time for motion for reconsideration of stay pending decision on writ petition. | 1.2 |
| 4/13/21 | AG | Appellate Motions & Submissions: Draft/Revise: Finalize reply in further support of writ petition to Nevada Supreme Court and in reply to plaintiffs' opposition. | 2.4 |
| 4/15/21 | SBV | Other Written Motions & Submiss.: Review/Analyze: Analyze Plaintiffs' Opposition to Defendant Valley Health System LLC's Motion to Reconsider Motion for Stay Pending Petition for Writ of Mandamus | .7 |
| 4/16/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare reply in further support of motion to reconsider denial of stay pending decision on writ petition and in reply to plaintiff's opposition thereto. | 5.8 |
| 4/16/21 | AG | Other Written Motions & Submiss.: Research: Conduct legal research to cite check plaintiff's opposition to CHH's motion for reconsideration of stay pending decision on writ petition to Nevada Supreme Court pertaining to district court's denial of summary judgment and obtain countervailing authority to said opposition in preparation for reply. | 1.8 |
| 4/20/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze order from court denying reconsideration of motion for stay. | .1 |
| 4/21/21 | AG | Appellate Motions & Submissions: Research: Obtain latest cases on stay applications to Supreme Court pending decision on writ petition. | 1.3 |
| 4/21/21 | AG | Appellate Motions & Submissions: Draft/Revise: Prepare motion for stay in Nevada Supreme Court due to denial thereof in district court. | 5.4 |
| 4/21/21 | SBV | Other Written Motions & Submiss.: Review/Analyze: Analyze minute order regarding denial of motion to stay pending writ | .2 |
| 4/21/21 | SBV | Appellate Motions & Submissions: Draft/Revise: Edit and approve Motion for Stay to NV SCT | .4 |
| 4/22/21 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation and finalize motion for stay in Nevada Supreme Court. | .8 |
| 4/22/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze proposed order pertaining to our motion for reconsideration of stay as proposed by plaintiff's counsel and | |

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

File Number
SBV1

28094-190

UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills

5/07/21
2961882
Page 2

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|----------|
| 4/26/21 | AG | comparing same to court's minute order for purposes of determining compliance therewith. Analysis/Strategy: Communicate (Other External): Review, analyze and respond to emails from R. Kim regarding pre-trial report and issues concerning motion for stay of proceedings pending determination of underlying writ in Nevada Supreme Court. | .4 .2 |
| 4/29/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze plaintiffs' opposition to motion for stay in Supreme Court for purposes of preparing substantive reply thereto. | .8 |
| 4/29/21 | AG | Appellate Motions & Submissions: Draft/Revise: Prepare reply in further support of motion for stay in Supreme Court and in reply to plaintiffs' opposition. | 2.3 |
| 4/30/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Continue preparation of motion to stay proceedings in district court pending writ petition to Nevada Supreme Court. | 2.7 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|------------------|
| Adam Garth | 42.6 | 250.00 | 10,650.00 |
| S. Brent Vogel | 2.2 | 250.00 | 550.00 |
| Total | 44.8 | | 11,200.00 |

Total Fees 11,200.00
Total Current Charges \$ 11,200.00

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LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

May 25, 2021
Invoice No. 2982480

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Disbursements through 05/25/21 | 6,187.50 |
| Total Current Charges | \$ 6,187.50 |

*** Please return this page with your payment. ***

Wire Instructions



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SUITE 4000
633 W. FIFTH STREET
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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

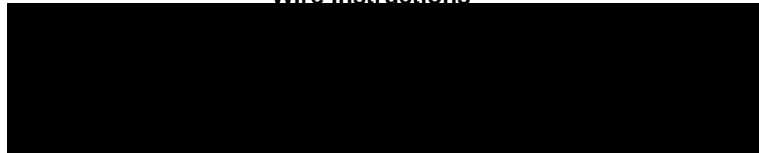
May 25, 2021
Invoice No. 2982480

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Disbursements through 05/25/21 | 6,187.50 |
| Total Current Charges | \$ 6,187.50 |

Wire Instructions



All Charges in US Dollars

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LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

File Number SBV1 28094-190 UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills
Page 1 5/25/21
2982480

| Date | Description of Disbursement | Units | Rate | Amount |
|-----------------------|--|-------|------|-------------|
| 5/19/21 | Medical Expert Services Abraham Ishaaya Inv#:#3POWELL Expert medical services rendered on 05/14/21 - 05/18/21. | | | 6,187.50 |
| Total Disbursements | | | | 6,187.50 |
| Total Current Charges | | | | \$ 6,187.50 |

28094-190
#lv. post
Garth, #

Abraham Ishaaya, M.D., F.C.C.P.



RECEIVED

MAY 20 2021

May 19, 2021

#3POWELL

LEWIS BRISBOIS
ATT: Adam Garth
6385 South Rainbow Blvd., Suite 600
Las Vegas, NV 89118

RE: CASE NAME: Estate of Rebecca Powell v Centennial Hills Hospital

Dear Adam:

Enclosed please find my charges to present for the above case.

Review of:

| | | |
|------|----------------------------|-----------|
| 5-14 | Preparation of declaration | 3 hours |
| 5-15 | Preparation of declaration | 4 hours |
| 5-16 | Preparation of declaration | 3.5 hours |
| 5-17 | Review/edit declaration | .25 hours |
| 5-18 | Review/edit declaration | .5 hours |
| | Telephone call | |

Total hours: 11.25 hours @ \$550

Total owed: \$6,187.50

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,

Avi Ishaaya, M.D.

LEWIS BRISBOIS BISGAARD & SMITH LLP

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

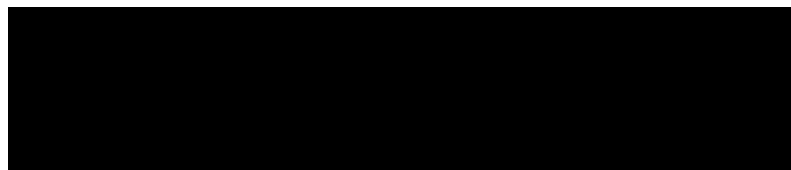
June 11, 2021
Invoice No. 2994277

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-----------|
| Current Fees through 05/31/21 | 905.00 |
| Current Disbursements through 05/31/21 | 14.00 |
| Total Current Charges | \$ 919.00 |

*** Please return this page with your payment. ***



All Charges in US Dollars

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UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

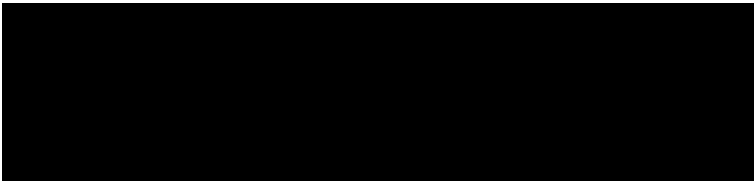
Attn: Richard Kim
Manager- Claims

June 11, 2021
Invoice No. 2994277

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-----------|
| Current Fees through 05/31/21 | 905.00 |
| Current Disbursements through 05/31/21 | 14.00 |
| Total Current Charges | \$ 919.00 |


All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 6/11/21 2994277 Page 1 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| 5/05/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ishaaya, re expert report deadlines and preparation for materials discussed in report in order to build defense of case via email. | .2 |
| 5/05/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, re expert report deadlines and preparation for materials discussed in report in order to build defense of case via email. | .2 |
| 5/05/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ruffalo, re expert report deadlines and preparation for materials discussed in report in order to build defense of case via email. | .2 |
| 5/06/21 | AG | Expert Discovery: Communicate (Other External): Telephone call with Dr. Ishaaya (critical care) regarding issues to be included in expert report to be exchanged. | .4 |
| 5/12/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ruffalo, re pharmacology review and records needed for his review and opinion to build defense in case via phone call and email. | .4 |
| 5/12/21 | AA | Experts/Consultants: Review/Analyze: Detailed legal review of Centennial Hills Hospital records in order to pull Medication Administration Records for retained expert, Dr. Ruffalo, for his review and opinion. | .5 |
| 5/13/21 | AG | Expert Discovery: Communicate (Other External): Telephone call with pharmacology expert, Dr. Ruffalo, to discuss contents of expert report. | .4 |
| 5/17/21 | AG | Expert Discovery: Review/Analyze: Review, analyze and revise Dr. Ishaaya's proposed expert report to be exchanged. | 1.3 |
| 5/18/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, re status of expert report for expert disclosure deadline via email. | .2 |
| 5/18/21 | AG | Expert Discovery: Communicate (Other External): Telephone call with Dr. Ishaaya to discuss proposed changes to expert report. | .2 |
| 5/18/21 | AG | Expert Discovery: Draft/Revise: Incorporate changes requested by Dr. Ishaaya to expert report. | .2 |
| 5/19/21 | AA | Document Production: Draft/Revise: Drafted Defendant's initial expert disclosure in order to establish defense experts , qualifications, and reports in order to continue to build defense in case. | .6 |
| 5/21/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze Supreme Court's decision on our motion for stay. | .1 |
| 5/21/21 | AG | Appellate Motions & Submissions: Communicate (With Client): Email to R. Kim reporting on results of motion to stay in Supreme Court. | .1 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|--|-------|------|--------|
| 5/14/21 | Court filing fee Comerica Commercial Card Services Inv#:043021STMT-ANOUWELS Trans Date: 04/06/2021 Nvefile* 007678289-0, Filing fee for exhibits g- m to defendant Valley Health System LLC's motion to reconsider. | | | 3.50 |
| 5/14/21 | Court filing fee Comerica Commercial Card Services Inv#:043021STMT-ANOUWELS Trans Date: 04/06/2021 Nvefile* 007677918-0, Filing fee for defendant Valley Health System LLC's motion to reconsider motion for stay pending petition for writ of mandamus. | | | 3.50 |
| 5/14/21 | Court filing fee Comerica Commercial Card Services Inv#:043021STMT-ANOUWELS Trans Date: 04/09/2021 Nvefile* | | | |

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FEDERAL I.D. NO 95-3720522

File Number SBV1 28094-190 UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills

6/11/21
2994277
Page 2

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|--|-------|------|--------------------------|
| 5/14/21 | 007699690-0, Filing fee for notice of entry of order. Court filing fee Comerica Commercial Card Services Inv#:043021STMT-ANOUWELS Trans Date: 04/16/2021 Nvefile* 007734419-0, Filing fee for defendant Valley Health System LLC's reply in further support of its motion to reconsider motion for stay pending petition for writ of mandamus and in reply to plaintiffs' opposition. | | | 3.50 3.50 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|------------|----------------|---------------|
| Arielle Atkinson | 2.3 | 100.00 | 230.00 |
| Adam Garth | 2.7 | 250.00 | 675.00 |
| Total | 5.0 | | 905.00 |

Total Fees 905.00
Total Disbursements 14.00

Total Current Charges \$ 919.00

eService Details

| Status | Name | Firm | Served | Date Opened |
|--------|----------------------|-------------------------------------|--------|---------------------|
| Sent | Paul S. Padda | PAUL PADDALAW, PLLC | Yes | Not Opened |
| Sent | Tony L. Abbatangelo | PAUL PADDALAW, PLLC | Yes | Not Opened |
| Sent | James P. Kelly | PAUL PADDALAW, PLLC | Yes | Not Opened |
| Sent | Paul Padda | Paul Padda Law, PLLC | Yes | Not Opened |
| Sent | Jennifer C. Greening | PAUL PADDALAW, PLLC | Yes | Not Opened |
| Sent | Diana Escobedo | PAUL PADDALAW, PLLC | Yes | 4/7/2021 8:59 AM PS |
| Sent | Srilata Shah | PAUL PADDALAW, PLLC | Yes | Not Opened |
| Sent | S. Brent Vogel | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Adam Garth | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Roya Rokni | Lewis Brisbois Bisgaard & Smith LLP | Yes | 4/6/2021 4:25 PM PS |
| Sent | Arielle Atkinson | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Jody Foote | John H. Cotton & Associates, Ltd. | Yes | Not Opened |
| Sent | Jessica D. Pincombe | John H. Cotton & Associates, Ltd. | Yes | 4/6/2021 4:16 PM PS |
| Sent | John H. Cotton | John H. Cotton & Associates, Ltd. | Yes | Not Opened |
| Sent | Brad Shipley | John H. Cotton & Associates, Ltd. | Yes | Not Opened |

Parties with No eService

Name
Isaiah Khosrof

Address

Name
Lloyd Creecy

Address

Name
Taryn Creecy

Address

Name
Darci Creecy

Address

Name
Vishal S. Shah MD

Address

Name
Brian Powell

Address

Fees

Exhibits - EXHS (CIV)

| Description | Amount |
|----------------------|--------|
| Filing Fee | \$0.00 |
| Filing Total: \$0.00 | |

| | |
|------------------------|--------|
| Total Filing Fee | \$0.00 |
| E-File Fee | \$3.50 |
| Envelope Total: \$3.50 | |

| | |
|----------------------|------------------|
| Transaction Amount | \$3.50 |
| Transaction Id | 8778489 |
| Order Id | 007678289-0 |
| Transaction Response | Payment Complete |

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eService Details

| Status | Name | Firm | Served | Date Opened |
|--------|----------------------|-------------------------------------|--------|---------------------|
| Sent | Paul S. Padda | PAUL PADDA LAW, PLLC | Yes | 4/6/2021 4:52 PM PS |
| Sent | Tony L. Abbatangelo | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | James P. Kelly | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | Paul Padda | Paul Padda Law, PLLC | Yes | Not Opened |
| Sent | Jennifer C. Greening | PAUL PADDA LAW, PLLC | Yes | Not Opened |
| Sent | Diana Escobedo | PAUL PADDA LAW, PLLC | Yes | 4/6/2021 4:17 PM PS |
| Sent | Srilata Shah | PAUL PADDA LAW, PLLC | Yes | 4/6/2021 4:14 PM PS |
| Sent | S. Brent Vogel | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Adam Garth | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Roya Rokni | Lewis Brisbois Bisgaard & Smith LLP | Yes | 4/6/2021 4:24 PM PS |
| Sent | Arielle Atkinson | Lewis Brisbois Bisgaard & Smith LLP | Yes | Not Opened |
| Sent | Jody Foote | John H. Cotton & Associates, Ltd. | Yes | Not Opened |
| Sent | Jessica D. Pincombe | John H. Cotton & Associates, Ltd. | Yes | 4/6/2021 4:12 PM PS |
| Sent | John H. Cotton | John H. Cotton & Associates, Ltd. | Yes | Not Opened |
| Sent | Brad Shipley | John H. Cotton & Associates, Ltd. | Yes | 4/6/2021 4:13 PM PS |

Parties with No eService

Name
Isaiah Khosrof

Address

Name
Lloyd Creecy

Address

Name
Taryn Creecy

Address

Name
Darci Creecy

Address

Name
Vishal S. Shah MD

Address

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

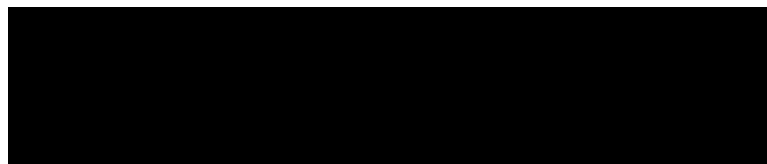
July 19, 2021
Invoice No. 3026387

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|---------------------|
| Current Fees through 06/30/21 | 6,629.50 |
| Current Disbursements through 06/30/21 | 10,350.00 |
| Total Current Charges | <u>\$ 16,979.50</u> |

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All Charges in US Dollars

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TELEPHONE (213) 250-1800

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367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

July 19, 2021
Invoice No. 3026387

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 06/30/21 | 6,629.50 |
| Current Disbursements through 06/30/21 | 10,350.00 |
| Total Current Charges | \$ 16,979.50 |

All Charges in US Dollars

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SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 7/19/21 3026387 Page 1 |
|---------------------|-----------|---|------------------------------|
| Date | Atty | Description of Services Rendered | Hours |
| 6/04/21 | AG | Document Production: Review/Analyze: Review and analyze email and attached letters regarding discovery issues raised by plaintiff concerning our discovery responses. | .3 |
| 6/04/21 | HA | Written Discovery: Communicate (Other External): Review and analyze correspondence from Plaintiff's counsel outlining disputed responses to Plaintiff's requests for production of documents in preparation to respond to same; including review of responses in dispute. | .4 |
| 6/04/21 | HA | Written Discovery: Review/Analyze: Review and analyze correspondence from Plaintiff's counsel providing signed Confidentiality Agreement and requesting supplemental responses to requests for production of documents in preparation to respond to same; including review of responses to request for production in dispute. | .3 |
| 6/04/21 | HA | Written Discovery: Communicate (Other External): Prepare written correspondence with Plaintiff's counsel responding to Plaintiff's demand for supplemental responses to requests for production of documents. | .4 |
| 6/04/21 | HA | Written Discovery: Review/Analyze: Review and analyze Confidentiality Agreement as signed by Plaintiff in preparation to submit same to court for approval and signature. | .1 |
| 6/08/21 | HA | Court Mandated Conferences: Communicate (Other External): Review and respond to written correspondence with Plaintiff's counsel requesting EDCR 2.34 conference re: disputed discovery request. | .3 |
| 6/08/21 | SBV | Experts/Consultants: Draft/Revise: Analyze and edit Dr. Ruffalo's draft expert report | .6 |
| 6/08/21 | SBV | Experts/Consultants: Draft/Revise: Analyze and edit Dr. Ishaaya's draft expert report | .7 |
| 6/11/21 | AG | Expert Discovery: Communicate (Other External): Email to Dr. Ruffalo along with revised report requesting review and signature. | .1 |
| 6/11/21 | HA | Court Mandated Conferences: Plan & Prepare For: Plan and prepare for EDCR 2.34 conference with Paul Padda, including review of pleadings, discovery, and relevant records. | .9 |
| 6/11/21 | HA | Court Mandated Conferences: Appear For/Attend: Attend EDCR 2.34 conference with Paul Padda re supplemental responses to requests for production of documents. | .5 |
| 6/14/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, in order to request expert's report for expert disclosure deadline via email. | .4 |
| 6/14/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ruffalo, in order to retrieve expert's report for initial expert disclosure via email. | .2 |
| 6/14/21 | AG | Expert Discovery: Draft/Revise: Continue preparation of Centennial Hills Hospital's expert disclosure. | .3 |
| 6/14/21 | AG | Expert Discovery: Review/Analyze: Review and analyze revised expert report from pharmacology expert Richard Ruffalo, MD For the purposes of exchanging same with plaintiff for initial expert exchange. | .4 |
| 6/14/21 | AG | Expert Discovery: Communicate (Other External): Telephone call with Richard Ruffalo, MD to discuss initial expert report and proposed changes and edits thereto in preparation for expert disclosure. | .2 |
| 6/14/21 | HA | Document Production: Review/Analyze: Review and analyze policies and procedures as identified by Amanda Nichols to determine which may be produced per Plaintiffs' requests for production of documents in light of protective order executed by the parties and signed by the court. | .8 |
| 6/14/21 | HA | Document Production: Communicate (With Client): Prepare email correspondence with Amanda Nichols re obtaining policies and procedures to be produced subject to executed protective order. | .2 |
| 6/14/21 | HA | Document Production: Communicate (With Client): Review and respond to email correspondence with Amanda Nichols re obtaining policies and procedures to be produced subject to executed protective order. | .1 |
| 6/14/21 | HA | Document Production: Review/Analyze: Review and analyze additional policies and | |

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|--------------------|------------------|---|---------------------------------------|
| File Number | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 7/19/21 3026387 Page 2 |
| SBV1 | | | |

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| | | procedures provided by Amanda Nichols to be produced subject to executed protective order. | .3 |
| 6/14/21 | HA | Document Production: Review/Analyze: Review and analyze medical record to locate entries for inclusion in supplemental responses to Plaintiffs' requests for production of documents. | .6 |
| 6/14/21 | HA | Document Production: Review/Analyze: Prepare supplemental responses to Plaintiffs' requests for production of documents. | 1.2 |
| 6/15/21 | AA | Document Production: Review/Analyze: Detailed legal analysis of exhibits produced as supplemental responses in order to ensure all documents are compliant with the Protective Order (30 pgs). | .5 |
| 6/15/21 | AG | Document Production: Draft/Revise: Continue preparation of supplemental response to request for production of documents to include policies and procedures subject to protective order. | .4 |
| 6/16/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ruffalo, in order to ensure all policies and procedures were sent for his review for anticipated rebuttal expert disclosure via email. | .3 |
| 6/16/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, in order to ensure all policies and procedures were sent for his review for anticipated rebuttal expert disclosure via email. | .2 |
| 6/16/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ishaaya, in order to ensure all policies and procedures were sent for his review for anticipated rebuttal expert disclosure via email. | .2 |
| 6/16/21 | SBV | Document Production: Review/Analyze: Analyze plaintiff's subpoena to the NV department of health and human services | .2 |
| 6/16/21 | SBV | Depositions: Review/Analyze: Analyze notice of subpoena to Clark County Coroner | .1 |
| 6/17/21 | AG | Analysis/Strategy: Communicate (Other Outside Counsel): Telephone call from co-defense counsel regarding strategy pertaining to expert exchanges, expert depositions, depositions of treating physicians and depositions of plaintiffs. | .8 |
| 6/17/21 | AG | Expert Discovery: Communicate (Other External): Review, analyze and respond to multiple emails to hospitalist expert, Dr. Shah, regarding expert declaration. | .3 |
| 6/17/21 | HA | Written Discovery: Review/Analyze: Review and analyze Plaintiff Brian Powell as Estate Special Administrator's Second Supplemental Answers to Interrogatories, including comparing to previous supplement, to evaluate any additional documents and witnesses produced. | .4 |
| 6/18/21 | AG | Expert Discovery: Review/Analyze: Review and analyze draft report from hospitalist expert Dr. Shah for purposes of preparing expert disclosure and determining the extent to which all opinions of plaintiffs expert or appropriately addressed and refuted. | .6 |
| 6/18/21 | HA | Experts/Consultants: Review/Analyze: Review and analyze expert report as prepared by Dr. Shah in preparation to revise and serve same, including review of record to ascertain report's accuracy. | 1.2 |
| 6/18/21 | HA | Experts/Consultants: Draft/Revise: Revise expert report as prepared by Dr. Shah in preparation to revise and serve same. | .9 |
| 6/18/21 | HA | Experts/Consultants: Draft/Revise: Review and analyze initial expert disclosure as prepared by paralegal in preparation to serve same. Approved for service. | .3 |
| 6/18/21 | HA | Experts/Consultants: Draft/Revise: Review and analyze third supplemental NRCP 16.1 disclosure, including initial expert disclosure, by Plaintiffs (268 pages) in preparation to send to our experts for rebuttal and to draft summary of same. | .9 |
| 6/18/21 | HA | Experts/Consultants: Draft/Revise: Review and analyze initial expert disclosure by | |

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|----------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 7/19/21 3026387 Page 3 |
|----------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| | | co-defendants in preparation to send to our experts for rebuttal and to draft summary of same. | .4 |
| 6/18/21 | HA | Experts/Consultants: Draft/Revise: Telephone conference with Dr. Shah re final revisions to his draft expert report in preparation to serve same. | .1 |
| 6/18/21 | SBV | Written Discovery: Review/Analyze: Review correspondence from plaintiff's counsel regarding discovery issues | .1 |
| 6/18/21 | SBV | Expert Discovery: Draft/Revise: Finalize and approve initial expert disclosure | .4 |
| 6/21/21 | AA | Document Production: Review/Analyze: Detailed legal review of Plaintiffs' Third supplement of Expert disclosures and Defendants' Expert disclosure in order to determine necessary documents for our expert's reviews and opinions in order to build defense in case. | 1.0 |
| 6/21/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, in order to send necessary expert documents for rebuttal report purposes to continue to build defense in case via email. | .4 |
| 6/21/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ruffalo, in order to send necessary expert documents for rebuttal report purposes to continue to build defense in case via email. | .2 |
| 6/21/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ishaaya, in order to send necessary expert documents for rebuttal report purposes to continue to build defense in case via email. | .2 |
| 6/21/21 | AG | Expert Discovery: Review/Analyze: Review and analyze report of plaintiff's economist to determine need to engage rebuttal expert. | .2 |
| 6/21/21 | AG | Expert Discovery: Communicate (With Client): Email to R. Kim requesting permission to engage economist as rebuttal expert. | .1 |
| 6/21/21 | AG | Expert Discovery: Review/Analyze: Review and analyze plaintiff's medical expert witness disclosures for purposes of determining plaintiff's case theory and to forward same to our experts for rebuttal reporting. | 1.3 |
| 6/21/21 | AG | Expert Discovery: Review/Analyze: Review and analyze email from R. Kim regarding engagement of economic expert for rebuttal. | .1 |
| 6/21/21 | AG | Expert Discovery: Communicate (Other External): Telephone call with possible economic expert, E. Volk regarding case and issues necessary for production of rebuttal report to plaintiff's expert. | .6 |
| 6/21/21 | SBV | Written Discovery: Review/Analyze: Analyze plaintiff's supplemental responses to interrogatories | .4 |
| 6/22/21 | AA | Experts/Consultants: Review/Analyze: Reviewed Plaintiffs' Third supplement to expert disclosure in order to establish vital documents for additional defense expert's review to build defense in case (268 pgs). | 1.0 |
| 6/22/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Erik Volk, in order to detail necessary documents for his review and opinion to continue to build defense in case via email. | .3 |
| 6/22/21 | AG | Expert Discovery: Review/Analyze: Review and analyze plaintiff's economic expert report and compare findings therein to plaintiff's prior NRCP 16.1 disclosures, responses to interrogatories, responses to request for production of documents and all supplements thereto for purposes of ascertaining basis for economist's opinions concerning loss of income. | 1.4 |
| 6/22/21 | AG | Expert Discovery: Research: Legal research pertaining to sufficiency of evidence upon which expert relies in formulating opinions to provide in expert report in preparation for eventual motion to preclude plaintiff's economist from testifying due to lack of sufficient evidentiary basis for opinions. | 2.3 |
| 6/22/21 | AG | Depositions: Research: Legal research on viable plaintiffs for negligent infliction of emotional | |

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FEDERAL I.D. NO 95-3720522

File Number 28094-190
SBV1

**UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills**

7/19/21
3026387
Page 4

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| | | distress claim in preparation for deposition of Lloyd Creecy and for possible motion to dismiss. | .4 |
| 6/22/21 | AG | Expert Discovery: Communicate (Other External): Telephone call with economic expert E. Volk regarding insufficiency of plaintiff's expert report and materials connected therewith. | .3 |
| 6/22/21 | AG | Expert Discovery: Draft/Revise: Continue preparation of letter to economic expert, E. Volk regarding rebuttal report. | .1 |
| 6/22/21 | AG | Analysis/Strategy: Communicate (With Client): Email to R. Kim regarding strategy pertaining to future motion to preclude economic expert. | .3 |
| 6/23/21 | SBV | Expert Discovery: Review/Analyze: Analyze Defendants Concio and Shah's Initial Disclosure of Expert Witnesses | .6 |
| 6/23/21 | SBV | Expert Discovery: Review/Analyze: Analyze Plaintiffs' Third Supplement to Initial Designation of Experts and Pre-Trial List of Witnesses and Documents Pursuant to NRCP 16.1(a)(3) | 1.5 |
| 6/24/21 | AG | Depositions: Communicate (Other Outside Counsel): Email to co-defense counsel regarding deposition strategy pertaining to expert and plaintiff depositions. | .2 |
| 6/25/21 | AG | Expert Discovery: Communicate (With Client): Telephone call with R. Kim regarding engagement of economist and strategy pertaining to moving to preclude plaintiff's economist after close of discovery. | .4 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|--|-------|------|-----------|
| 6/15/21 | Medical Expert Services Ruffalo & Associates, Inc. Inv#:2538 Expert medical services rendered on 06/14/21. | | | 10,350.00 |

| Recap of Services | Hours | Effective Rate | Fees |
|--------------------|-------------|----------------|-----------------|
| Arielle Atkinson | 4.9 | 100.00 | 490.00 |
| Adam Garth | 11.1 | 250.00 | 2,775.00 |
| Heather Armantrout | 10.3 | 215.00 | 2,214.50 |
| S. Brent Vogel | 4.6 | 250.00 | 1,150.00 |
| Total | 30.9 | | 6,629.50 |

Total Fees 6,629.50
Total Disbursements 10,350.00

Total Current Charges \$ 16,979.50

28094-190

RUFFALO & ASSOCIATES, INC

RECEIVED

JUN 21 2021

Invoice #: 2538
Invoice Date: 6/15/2021
Terms Net 30

RE: POWELL V. VALLEY HEALTH SYSTEM DBA CENTENNIAL HILLS HOSPITAL

Rereview of the following in preparation for my declaration:

Decedents medical records from Centennial Hills Hospital, autopsy and toxicology reports, Nevada State Nursing Board report, Affidavit of Sami Hashim, MD

3.5 2,100.00

Medical and pharmacology literature review to support my opinions

8.75 5,250.00

Preparation of my report

3.25 1,950.00

Discussion of case with Mr. Garth 06/14/2021

0.25 150.00

Completion of my report 06/14/2021

1.5 900.00

TOTAL HOURS: 17.25

Total \$10,350.00

Payments/Credits \$0.00

Balance Due \$10,350.00

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

August 7, 2021
Invoice No. 3043957

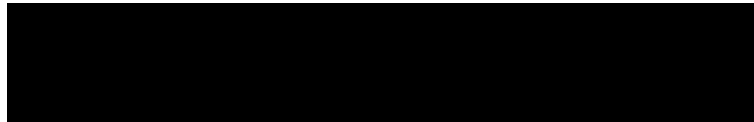
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Disbursements through 07/15/21 | 2,977.00 |
| Total Current Charges | \$ 2,977.00 |

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367 South Gulph Road
King of Prussia, PA 19406

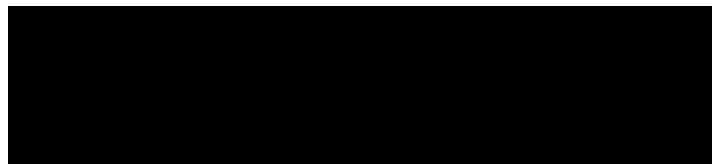
Attn: Richard Kim
Manager- Claims

August 7, 2021
Invoice No. 3043957

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Disbursements through 07/15/21 | 2,977.00 |
| Total Current Charges | \$ 2,977.00 |



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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FEDERAL I.D. NO 95-3720522

File Number SBV1 28094-190 UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills 8/07/21
Page 3043957 1

| Date | Description of Disbursement | Units | Rate | Amount |
|------------------------------|--|-------|-----------|-----------------|
| 7/15/21 | Court filing fee Comerica Commercial Card Services Inv#:063021STMT-ANOUWELS Trans Date: 06/04/2021 Nvefile* 007997526-0, Filing fee for notice of entry of order. | | | 3.50 |
| 7/15/21 | Court filing fee Comerica Commercial Card Services Inv#:063021STMT-ANOUWELS Trans Date: 06/18/2021 Nvefile* 008073913-0, Filing fee for initial expert disclosure. | | | 3.50 |
| 7/15/21 | Medical Expert Services Abraham Ishaaya Inv#:POWELL,R-071521 Expert medical services rendered on 07/15/21. | | | 2,970.00 |
| Total Disbursements | | | | 2,977.00 |
| Total Current Charges | | | \$ | 2,977.00 |

Abraham Ishaaya, M.D., F.C.C.P.

28094-190

July 15, 2021

#3POWELL

LEWIS BRISBOIS
ATT: Adam Garth
6385 South Rainbow Blvd., Suite 600
Las Vegas, NV 89118

RECEIVED

By Michael Woodard at 10:45 am, Jul 19, 2021

RE: CASE NAME: Estate of Rebecca Powell v Centennial Hills Hospital

Dear Adam:

Enclosed please find my charges to present for the above case.

Review of:

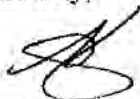
| | | |
|------|---|-----------|
| 6-24 | Expert report of James Leo MD | .7 hours |
| | Expert report of Dr. Cumbo | .2 hours |
| | Expert report of Dr. James Lineback | .9 hours |
| | Expert report of Dr. Kenneth Stein | 1.1 hours |
| 6-25 | Expert report of RN Griffith | .3 hours |
| | Policy of RRT | 2.1 hours |
| | Policy of Sentinel events | |
| | Policy of patient rights and responsibilities | |
| | Policy of involuntary detained status | |
| | Policy of event reporting and health care peer review | |
| 7-7 | Telephone call | .1 hours |

Total hours: 5.4 hours @ \$550

Total owed: \$2,970

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,



Avi Ishaaya, M.D.

LEWIS BRISBOIS BISGAARD & SMITH LLP

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

August 9, 2021
Invoice No. 3045385

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|-------------------------------|-------------|
| Current Fees through 07/31/21 | 1,026.50 |
| Total Current Charges | \$ 1,026.50 |

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367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

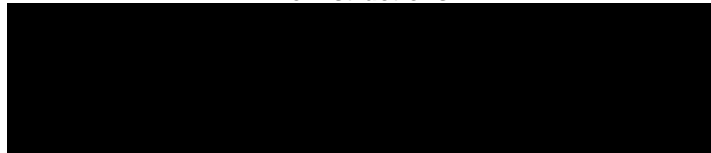
August 9, 2021
Invoice No. 3045385

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|-------------------------------|-------------|
| Current Fees through 07/31/21 | 1,026.50 |
| Total Current Charges | \$ 1,026.50 |

Wire Instructions



All Charges in US Dollars

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FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 8/09/21 3045385 Page 1 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| 7/07/21 | AG | Expert Discovery: Communicate (Other External): Telephone call from Dr. Ishaaya (critical care expert) regarding rebuttal arguments and report. | .3 |
| 7/13/21 | HA | Depositions: Communicate (Other External): Review and respond to email correspondence with opposing counsel's office re need for Plaintiffs' depositions. | .1 |
| 7/20/21 | AG | Expert Discovery: Communicate (Other Outside Counsel): Emails to co-defense counsel regarding deposition strategy pertaining to experts. | .2 |
| 7/21/21 | AG | Settlement/Non-Binding ADR: Communicate (With Client): Telephone call with R. Kim regarding mandatory mediation and strategy pertaining thereto. | .3 |
| 7/21/21 | AG | Settlement/Non-Binding ADR: Communicate (Other Outside Counsel): Telephone conference call with co-defense counsel regarding strategy pertaining to mediation, discovery extensions and trial extensions for purposes of awaiting decision of Nevada Supreme Court regarding writ petition. | .6 |
| 7/21/21 | AG | Settlement/Non-Binding ADR: Communicate (Other External): Email to all counsel regarding mandatory mediation in preparation for status check hearing. | .2 |
| 7/23/21 | AG | Settlement/Non-Binding ADR: Communicate (Other External): Review, analyze and respond to multiple emails from plaintiff's counsel regarding selection of mediator Stewart Bell and mediation parameters. | .3 |
| 7/26/21 | AG | Settlement/Non-Binding ADR: Communicate (Other External): Multiple emails to/from plaintiff's counsel regarding mediation issues and selection of mediator. | .3 |
| 7/27/21 | AG | Analysis/Strategy: Communicate (Other Outside Counsel): Email to co-defense counsel regarding deposition strategy and mediation issues. | .1 |
| 7/28/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, re status of expert report for attorney's, Adam Garth, review to continue to build defense in case via email. | .2 |
| 7/28/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ishaaya, re status of expert report for attorney's, Adam Garth, review to continue to build defense in case via email. | .2 |
| 7/28/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Ruffalo, re status of expert report for attorney's, Adam Garth, review to continue to build defense in case via email. | .2 |
| 7/28/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Erik Volk, re status of expert report for attorney's, Adam Garth, review to continue to build defense in case via email. | .2 |
| 7/28/21 | AG | Settlement/Non-Binding ADR: Communicate (Other External): Review, analyze and respond to to multiple emails from plaintiff's counsel and co-defense counsel regarding mediation with Judge Bell. | .4 |
| 7/28/21 | AG | Expert Discovery: Communicate (Other External): Emails to/from Dr. Ruffalo (pharmacology) regarding rebuttal report contents. | .3 |
| 7/29/21 | AG | Expert Discovery: Draft/Revise: Prepare rebuttal report for Dr. Ruffalo (pharmacology expert). | .6 |
| 7/29/21 | AG | Expert Discovery: Communicate (Other External): Email to pharmacology expert, Dr. Ruffalo, regarding rebuttal expert report. | .1 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------|----------------|--------|
| Arielle Atkinson | .8 | 100.00 | 80.00 |
| Adam Garth | 3.7 | 250.00 | 925.00 |

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File
Number
SBV1

28094-190

UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills

8/09/21
3045385
Page 2

| Recap of Services | | Hours | Effective Rate | Fees |
|-----------------------|--|-------|----------------|-------------|
| Heather Armantrout | | .1 | 215.00 | 21.50 |
| Total | | 4.6 | | 1,026.50 |
| Total Fees | | | | 1,026.50 |
| Total Current Charges | | | | \$ 1,026.50 |

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FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

August 31, 2021
Invoice No. 3069107

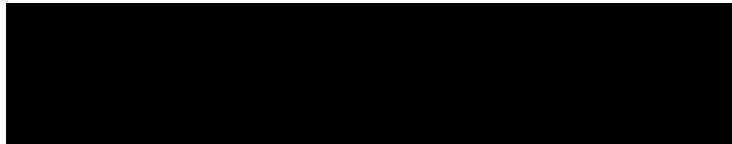
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-----------|
| Current Disbursements through 08/26/21 | 688.50 |
| Total Current Charges | \$ 688.50 |

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FEDERAL I.D. NO 95-3720522

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367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

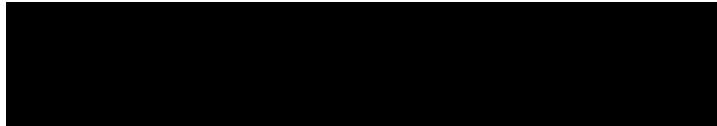
August 31, 2021
Invoice No. 3069107

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-----------|
| Current Disbursements through 08/26/21 | 688.50 |
| Total Current Charges | \$ 688.50 |

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

File Number SBV1 28094-190 UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills
Page 1 8/31/21 3069107

| Date | Description of Disbursement | Units | Rate | Amount |
|-----------------------|---|-------|------|--------|
| 8/26/21 | E123-Consulting Services J.S. Held, LLC Inv#:1274938 Professional services rendered on 06/21/21 - 08/26/21. | | | 688.50 |
| Total Disbursements | | | | 688.50 |
| Total Current Charges | | | \$ | 688.50 |

COHEN | VOLK
ECONOMIC CONSULTING GROUP

A PART OF  J.S. HELD

J.S. Held LLC



Invoice #: 1274938
Invoice Date: 2021-08-26
Due Date: 2021-09-25
Payment Terms: Net 30

Adam Garth
Lewis Brisbois Bisgaard & Smith LLP
6385 South Rainbow Blvd. Suite 600
Las Vegas Nevada 89118
United States

RECEIVED
AUG 30 2021

INVOICE

| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
|--------------|--|---------------|----------|
| 21061550 | Estate of Powell et al. v. Valley Health System LL | 62121341 | 62121341 |

| | |
|---------------------------------|-----------------|
| Professional Services Rendered: | \$675.00 |
| Expenses: | \$13.50 |
| Total This Invoice: | \$688.50 |

Rounding differences may exist compared to the detail pages.

TO ENSURE TIMELY PROCESSING PLEASE REMIT PAYMENT TO:

J.S. Held LLC



PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 2

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ECONOMIC CONSULTING GROUP

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J.S. Held LLC



Invoice #: 1274938
Invoice Date: 2021-08-26
Due Date: 2021-09-25
Payment Terms: Net 30

Adam Garth
Lewis Brisbois Bisgaard & Smith LLP
6385 South Rainbow Blvd. Suite 600
Las Vegas Nevada 89118
United States

RECEIVED
AUG 30 2021

INVOICE

| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
|--------------|--|---------------|----------|
| 21061550 | Estate of Powell et al, v. Valley Health System LL | 62121341 | 62121341 |

Lewis Brisbois Bisgaard & Smith LLP

This Invoice Represents Your 100% Share

PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 1

Vendor: 87159 J.S. Held, LLC
Voucher: 2797265 Dist: 6782990
Approved by Stephen Vogel on 08/31/2021 11.13 AM

Doc ID: 0002Y39L-2
Date: 8/26/21
Check#: 341295

Page 2 of 5
Amount: 147,688.50

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ECONOMIC CONSULTING GROUP

A PART OF JS|HELD

J.S. Held LLC



Invoice #: 1274938
Invoice Date: 2021-08-26
Due Date: 2021-09-25
Payment Terms: Net 30

Adam Garth
Lewis Brisbois Bisgaard & Smith LLP
6385 South Rainbow Blvd. Suite 600
Las Vegas Nevada 89118
United States

INVOICE

| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
|--------------|--|---------------|----------|
| 21061550 | Estate of Powell et al. v. Valley Health System LL | 62121341 | 62121341 |

SUMMARY BY DEPARTMENT:

| DESCRIPTION | TIME | RATE | AMOUNT |
|--|------|----------|----------|
| Forensic Accounting & Economics: | | | |
| Correspondence | 0.30 | \$450.00 | \$135.00 |
| Document Review | 1.10 | \$450.00 | \$495.00 |
| Project Research | 0.10 | \$450.00 | \$45.00 |
| Forensic Accounting & Economics Total: | 1.50 | | \$675.00 |
| Total Professional Services Rendered: | 1.50 | | \$675.00 |

PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 3

Vendor: 87159 J.S. Held, LLC
Voucher: 2797265 Dist: 6782990
Approved by Stephen Vogel on 08/31/2021 11.13 AM

Doc ID: 0002Y39L-3
Date: 8/26/21
Check#: 341295

Page 3 of 5
Amount: 148,688.50

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ECONOMIC CONSULTING GROUP

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J.S. Held LLC



Invoice #: 1274938
Invoice Date: 2021-08-26
Due Date: 2021-09-25
Payment Terms: Net 30

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6385 South Rainbow Blvd. Suite 600
Las Vegas Nevada 89118
United States

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| | | | |
|--------------|--|---------------|----------|
| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
| 21061550 | Estate of Powell et al. v. Valley Health System LL | 62121341 | 62121341 |

DETAILS:

| DATE | DURATION | NOTES |
|-------------------------|-------------|---------------------------------|
| Correspondence | | |
| 6/21/2021 | 0.20 | Correspondence with law office. |
| 6/22/2021 | 0.10 | Teleconference with law office. |
| Document Review | | |
| 6/22/2021 | 0.10 | Review documents received. |
| 6/23/2021 | 0.80 | Review documents received. |
| 7/28/2021 | 0.20 | Review documents received. |
| Project Research | | |
| 7/29/2021 | 0.10 | Research economic loss. |
| TOTAL HOURS: | 1.50 | |

PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 4

COHEN | VOLK
ECONOMIC CONSULTING GROUP

A PART OF  J.S. HELD

J.S. Held LLC



Invoice #: 1274938
Invoice Date: 2021-08-26
Due Date: 2021-09-25
Payment Terms: Net 30

Adam Garth
Lewis Brisbois Bisgaard & Smith LLP
6385 South Rainbow Blvd. Suite 600
Las Vegas Nevada 89118
United States

INVOICE

| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
|--------------|--|---------------|----------|
| 21061550 | Estate of Powell et al. v. Valley Health System LL | 62121341 | 62121341 |

EXPENSE SUMMARY:

| DATE | AMOUNT |
|-------------|---------|
| Other | |
| 8/26/2021 | \$13.50 |
| Total Other | \$13.50 |
| Total | \$13.50 |

EXPENSE DETAILS:

| DATE | DESCRIPTION | AMOUNT |
|---------------|---------------------|---------|
| 8/26/2021 | File Administration | \$13.50 |
| TOTAL AMOUNT: | | \$13.50 |

PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 5

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

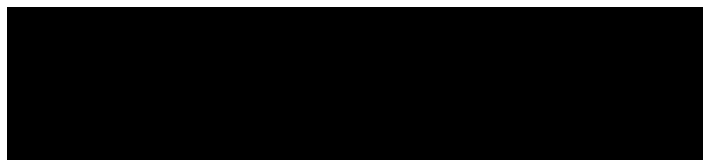
September 9, 2021
Invoice No. 3072540

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------------|
| Current Fees through 08/31/21 | 5,841.50 |
| Current Disbursements through 08/31/21 | 3,000.00 |
| Total Current Charges | <u>\$ 8,841.50</u> |

*** Please return this page with your payment. ***



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

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367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

September 9, 2021
Invoice No. 3072540

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------------|
| Current Fees through 08/31/21 | 5,841.50 |
| Current Disbursements through 08/31/21 | 3,000.00 |
| Total Current Charges | <u>\$ 8,841.50</u> |

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 9/09/21 3072540 Page 1 |
|---------------------|-----------|---|------------------------------|
| Date | Atty | Description of Services Rendered | Hours |
| 8/03/21 | AG | Expert Discovery: Review/Analyze: Review and analyze Dr. Ishaaya's (critical care expert) rebuttal to plaintiff's expert reports for purposes of determining sufficiency thereof an in preparation for discussion with expert. | .6 |
| 8/03/21 | AG | Settlement/Non-Binding ADR: Communicate (Other External): Telephone call with JAMS regarding forthcoming mediation issues. | .2 |
| 8/04/21 | AG | Expert Discovery: Communicate (Other External): Email to Dr. Ishaaya regarding expert rebuttal report. | .1 |
| 8/04/21 | AG | Expert Discovery: Communicate (Other External): Telephone call from Dr. Ishaaya (critical care) regarding rebuttal report. | .3 |
| 8/04/21 | AG | Expert Discovery: Draft/Revise: Revise Dr. Ishaaya's rebuttal report. | 1.4 |
| 8/04/21 | AG | Court Mandated Conferences: Communicate (Other External): Email to plaintiff's counsel regarding joint case status report and status check hearing. | .1 |
| 8/05/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze today's decision from Nevada Court of Appeals defining the commencement of inquiry notice for purposes of the running of the statute of limitations for purposes of preparing notice of supplemental authorities to Nevada Supreme Court for consideration of writ petition. | .4 |
| 8/05/21 | AG | Appellate Motions & Submissions: Draft/Revise: Prepare notice of supplemental authority advising Nevada Supreme Court of today's Court of Appeals decision defining commencement of inquiry notice for statute of limitations purposes for consideration on writ petition. | 1.3 |
| 8/05/21 | HA | Depositions: Review/Analyze: Review and analyze notices of Plaintiffs' depositions as prepared by assistant, in preparation for serving same. | .1 |
| 8/09/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Mr. Volk, re his final opinions and review of additional records in order to supply rebuttal report via email. | .3 |
| 8/11/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze plaintiffs' proposed joint case status report ordered to be prepared by the court for purposes of either approving of same or suggesting modifications thereto. | .3 |
| 8/11/21 | AG | Analysis/Strategy: Communicate (Other Outside Counsel): Email to co-defense counsel regarding proposed joint case status report and extension of discovery deadline strategy pertaining thereto in anticipation of decision from Nevada Supreme Court regarding denial of motion for summary judgment. | .2 |
| 8/11/21 | AG | Settlement/Non-Binding ADR: Communicate (With Client): Email to R. Kim regarding approval of mediation. | .1 |
| 8/12/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Email to all counsel regarding proposed joint status report and suggestion of extension of all discovery and remaining deadlines to permit mediation to occur (but primarily for purposes of awaiting Supreme Court's decision pertaining to dismissal on grounds of statute of limitations). | .2 |
| 8/12/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze email from co-defense counsel regarding proposal pertaining to extension of discovery deadlines as specified in proposed joint status report to court. | .1 |
| 8/12/21 | AG | Depositions: Plan & Prepare For: Review and analyze NNMC medical records (776 pages) for purposes of ascertaining all patient encounters with L. Gardner, B. Slocum and W. Hodges in preparation for depositions of said individuals and to reconcile any inconsistencies in charting pertaining to plaintiff. | 3.6 |
| 8/17/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze plaintiffs revised draft of joint case status report as required by the court. | .3 |
| 8/17/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Email to all counsel | |

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

File Number SBV1 **28094-190**

**UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills**

9/09/21
3072540
Page 2

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| | | regarding proposed joint case status report. | .1 |
| 8/18/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Mr. Volk, re rebuttal expert report and opinions in order to continue to build defense of case via email. | .2 |
| 8/18/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, re rebuttal expert report and opinions in order to continue to build defense of case via email. | .3 |
| 8/18/21 | AA | Experts/Consultants: Draft/Revise: Drafted Defendant's Rebuttal Expert Disclosure in order to re-introduce defense experts, and establish rebuttal reports from experts received thus far, to continue building defense in case. | 1.1 |
| 8/18/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Review, analyze and respond to emails regarding SAO to extend discovery deadlines. | .2 |
| 8/23/21 | AG | Expert Discovery: Communicate (Other External): Review, analyze and respond to email from hospitalist expert Dr. Shah regarding data inclusion in rebuttal report. | .1 |
| 8/23/21 | AG | Expert Discovery: Review/Analyze: Review, analyze and revise rebuttal report of our economic expert, E. Volk, in preparation for exchange. | .6 |
| 8/23/21 | AG | Expert Discovery: Communicate (Other External): Email to economist E. Volk pertaining to expert rebuttal report. | .1 |
| 8/24/21 | AA | Experts/Consultants: Communicate (Other External): Correspondence with retained expert, Dr. Shah, re final rebuttal report draft in order to establish additional comments made by attorney via email. | .4 |
| 8/24/21 | AG | Expert Discovery: Review/Analyze: Review and analyze rebuttal report from hospitalist expert Dr. Shah and provide edits to same in preparation for rebuttal exchange. | .9 |
| 8/24/21 | AG | Expert Discovery: Communicate (Other External): Email to/from Dr. Shah pertaining to required edits to rebuttal report. | .3 |
| 8/24/21 | AG | Expert Discovery: Draft/Revise: Continue preparation of rebuttal expert disclosure. | .4 |
| 8/25/21 | AG | Expert Discovery: Communicate (Other External): Telephone call from Dr. Shah regarding rebuttal report. | .3 |
| 8/25/21 | AG | Analysis/Strategy: Draft/Revise: Begin preparation of comprehensive evaluation as requested by R. Kim for excess carrier. | 1.2 |
| 8/26/21 | AA | Document Production: Plan & Prepare For: Prepared all expert reports in order to ensure key facts are presented in Defendant's rebuttal expert disclosure to continue to continue to build defense in case. | .4 |
| 8/27/21 | AG | Analysis/Strategy: Draft/Revise: Continue preparation of extensive comprehensive case analysis including expert opinions of both plaintiffs and defendants as well as state of case, discovery, settlement value and strategy. | 5.2 |
| 8/30/21 | AG | Analysis/Strategy: Draft/Revise: Continue preparation and finalize case evaluation report to R. Kim per his request for review by excess carrier including expert opinion summary, liability issues and settlement strategy. | 2.2 |
| 8/31/21 | AG | Depositions: Communicate (Other External): Review, analyze and respond to email from plaintiff's counsel regarding depositions of experts in light of mediation. | .2 |
| 8/31/21 | AG | Depositions: Draft/Revise: Prepare 5 notices to vacate depositions. | .4 |
| 8/31/21 | AG | Experts/Consultants: Communicate (Other External): Telephone call with Dr. Ruffalo regarding rebuttal reports of experts. | .8 |

| Date | Description of Disbursement | Units | Rate | Amount |
|------|-----------------------------|-------|------|--------|
|------|-----------------------------|-------|------|--------|

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

File Number SBV1 28094-190 UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills 9/09/21
3072540
Page 3

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|---|-------|------|----------|
| 8/12/21 | E121-Arbitrators/Mediators Fees JAMS, INC. Inv#:5821548 Mediation/arbitration services rendered on 08/10/21. -Approved by Richard Kim from UHS of Delaware on 08/11/21. | | | 3,000.00 |

| Recap of Services | Hours | Effective Rate | Fees |
|--------------------|-------------|----------------|-----------------|
| Arielle Atkinson | 2.7 | 100.00 | 270.00 |
| Adam Garth | 22.2 | 250.00 | 5,550.00 |
| Heather Armantrout | .1 | 215.00 | 21.50 |
| Total | 25.0 | | 5,841.50 |

| | |
|----------------------------|-----------------|
| Total Fees | 5,841.50 |
| Total Disbursements | 3,000.00 |

| | |
|------------------------------|--------------------|
| Total Current Charges | \$ 8,841.50 |
|------------------------------|--------------------|

Lewis Brisbois Bisgaard & Smith LLP

Cost Advance Request

| |
|------------|
| |
| # LV-10883 |

1. Check — Date Needed: 8/12/2021

2. Type of Expense:

24500

| | | | | | |
|--------------------------|--------------------------------|----|-------------------------------------|--------------------------------------|----|
| <input type="checkbox"/> | Filing Fee | 5 | <input type="checkbox"/> | Court Reporter Fee | CR |
| <input type="checkbox"/> | Witness Fee | 7 | <input checked="" type="checkbox"/> | Mediation / Arbitration Fee** | AM |
| <input type="checkbox"/> | Prof. Consulting / Service Fee | S | <input type="checkbox"/> | COD Transcription (Invoice Needed)** | G |
| <input type="checkbox"/> | Expert Witness Fee** | J | <input type="checkbox"/> | Reproduction / Copies | R |
| <input type="checkbox"/> | Jury Fees | JF | <input type="checkbox"/> | Reproduction / Medical Records | RR |
| <input type="checkbox"/> | Deposition | H | <input type="checkbox"/> | International Vendor & Wires | |

Any client-related requests over \$500.00 require LBBS Cost Advance Committee approval and should be sent to "LBBS Cost Advances" (LBBSCostAdvances@lewisbrisbois.com)

All educational expenses/seminars require Karl Loureiro's approval.

3. Client and File Name: Powell v. Valley Health System *
4. Client and Matter No.: 28094-190 *
5. Amount: \$3,000.00
6. Payee / Vendor: * JAMS
7. Mailing Address: PO Box 845402
Los Angeles, CA 90084
8. Payee's Telephone No.: 949.224.4654
9. Payee's Tax I.D. No.: 68-0542699
10. Explanation for billing purposes: Mediation Deposit

Attorney: Adam Garth Ext: 4335
Secretary: Roya Rokni Ext: 4318

Auth. by/ / /s/ Adam Garth Date 8/11/2021
Signature

Return to: Roya
Floor: 5

AM

Approved by Richard Kim
from UHS of Delaware
on 08/11/21.

4821-8604-0822.1

Remember to have Attorney Sign and Attach all Supporting Backup

Vendor: 24500 JAMS, INC.
Voucher: 2790528 Dist: 6764378

Doc ID: 0002XMRX-1
Date: 8/12/21
Check#: 336584

Page 1 of 3
Amount: 3,000.00
156

DEPOSIT REQUEST

**Invoice Date**

8/10/2021

Invoice Number

5821548

Bill To: Mr. S. Vogel Esq.
Lewis Brisbois Bisgaard & Smith LLP
6385 S. Rainbow Blvd.
Suite 600
Las Vegas, NV 89118
US

Copy To: Adam Garth, Esq.
Lewis Brisbois Bisgaard & Smith LLP
6385 S. Rainbow Blvd.
Suite 600
Las Vegas, Nevada 89118

Reference #: 1260006442 - Rep# 4
Billing Specialist: Mason, Glenn T
Email: gmason@jamsadr.com
Telephone: 949-224-4654
Employer ID: 68-0542699

RE: Estate of Powell, Rebecca, et al. vs. Valley Health System, LLC dba
Centennial Hills Hospital Medical Center

Neutral(s): Hon. Stewart Bell (Ret.)

Representing: Centennial Hills Hospital

Hearing Type: MEDIATION

SP

| Date / Time | Description | Your Share |
|-------------|--|-------------|
| 8/10/21 | Hon. Stewart L Bell (Ret.) Deposit for services: To be applied to professional time (session time, pre and post session reading, research, preparation, conference calls, travel, etc.), expenses, and case management fees. Failure to pay the deposit by the due date may result in a delay in service or cancellation of the session. With the exception of non-refundable fees, (Please review the Neutral's fee schedule regarding case management fee and cancellation policies), any unused portion of this deposit will be refunded at the conclusion of the case. | \$ 3,000.00 |

Total Billed: \$ 3,000.00

Total Payment: \$ 0

Balance: \$ 3,000.00

Unused deposits will not be refunded until the conclusion of the case. If the case cancels or continues, fees are due per our cancellation and continuance policy. Please make checks payable to JAMS, Inc. For Arbitration Cases, please contact your case manager for due date, otherwise, payment is due upon receipt.

[Click here to pay](#)

Standard mail:
P.O. Box 845402
Los Angeles, CA 90084

Overnight mail:
18881 Von Karman Ave. Suite 350
Irvine, CA 92612

Printed on 8/11/2021 / 1260006442 - Rep# 4

1 of 1

Vendor: 24500 JAMS, INC.
Voucher: 2790528 Dist: 6764378

Doc ID: 0002XMRX-2
Date: 8/12/21
Check#: 336584


Page 2 of 3
Amount: 3,000.00

157

From: Kim, Richard <Richard.Kim@uhsinc.com>
Sent: Wednesday, August 11, 2021 8:20 AM
To: Garth, Adam <Adam.Garth@lewisbrisbois.com>
Subject: FW: [EXT] Estate of Powell, Rebecca, et al. vs. Valley Health System, LLC dba Centennial Hills Hospital Medical Center - JAMS Ref No. 1260006442 - Deposit Request 5821548

Hi Adam, this is fine. Thanks, Richard.

Richard Kim
Manager – Claims



From: Garth, Adam <Adam.Garth@lewisbrisbois.com>
Sent: Wednesday, August 11, 2021 9:54 AM
To: Kim, Richard <Richard.Kim@uhsinc.com>
Cc: Vogel, Brent <Brent.Vogel@lewisbrisbois.com>; Rokni, Roya <Roya.Rokni@lewisbrisbois.com>; Atkinson, Arielle <Arielle.Atkinson@lewisbrisbois.com>; Sirsy, Shady <Shady.Sirsy@lewisbrisbois.com>; Armantrout, Heather <Heather.Armantrout@lewisbrisbois.com>
Subject: [External] FW: [EXT] Estate of Powell, Rebecca, et al. vs. Valley Health System, LLC dba Centennial Hills Hospital Medical Center - JAMS Ref No. 1260006442 - Deposit Request 5821548

WARNING: This email is from an external source. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe. REPORT any suspicious emails by clicking the "REPORT SPAM" button in Outlook.

Richard,

Please see attached invoice. All we need is your written approval to pay. Many thanks.

Adam Garth

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

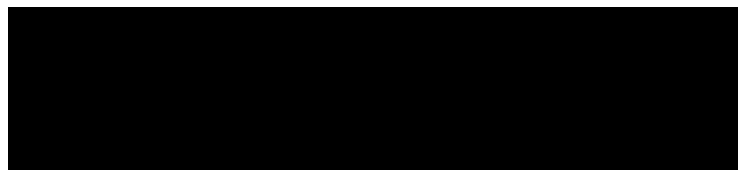
October 12, 2021
Invoice No. 3102586

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 09/30/21 | 4,375.00 |
| Current Disbursements through 09/30/21 | 3,855.60 |
| Total Current Charges | \$ 8,230.60 |

*** Please return this page with your payment. ***



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

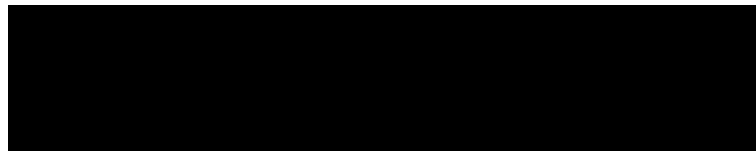
October 12, 2021
Invoice No. 3102586

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
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| Current Disbursements through 09/30/21 | 3,855.60 |
| Total Current Charges | \$ 8,230.60 |

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|------------------------|-----------|---|-------------------------------|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 10/12/21 3102586 Page 1 |
|------------------------|-----------|---|-------------------------------|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|---|-------|
| 9/08/21 | AG | Trial & Hearing Attendance: Review/Analyze: Review and analyze court minute order pertaining to status check and joint case status report. | .2 |
| 9/08/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Email to plaintiff's counsel regarding court minute order and preparation of stipulation to extend discovery deadlines. | .1 |
| 9/08/21 | AG | Depositions: Communicate (Other External): Review, analyze and respond to email from plaintiff's counsel regarding further deposition of NP Lambert pertaining to Alisa Borden. | .1 |
| 9/10/21 | AG | Expert Discovery: Communicate (Other External): Telephone call with Dr. Shah to go over plaintiff's experts' rebuttal reports in preparation for mediation brief. | .7 |
| 9/20/21 | AG | Expert Discovery: Communicate (Other External): Telephone call with Dr. Ishaaya regarding rebuttal reports of plaintiffs' experts for purposes of inclusion into mediation brief. | .4 |
| 9/28/21 | AG | Settlement/Non-Binding ADR: Review/Analyze: Review and analyze Centennial Hills Hospital chart for decedent (1,166 pages) for purposes of incorporation of same into mediation brief. | 3.8 |
| 9/28/21 | AG | Settlement/Non-Binding ADR: Draft/Revise: Begin preparation of extensive mediation brief incorporating salient portions of more than 1,100 pages of medical records and significant motion practice resulting in additional appellate motion practice to be explained in detail to mediator for purposes of putting case in appropriate resolution posture. | 4.1 |
| 9/29/21 | AG | Settlement/Non-Binding ADR: Draft/Revise: Continued preparation of mediation brief. | 1.8 |
| 9/30/21 | AG | Settlement/Non-Binding ADR: Communicate (With Client): Email to R. Kim regarding mediation brief. | .1 |
| 9/30/21 | AG | Settlement/Non-Binding ADR: Draft/Revise: Continue preparation of extensive mediation brief summarizing all medicine, findings of 3 medical experts and one economic expert, assessment of case strengths and weaknesses, and summary of legal issues surrounding writ petition to Nevada Supreme Court | 6.2 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|---|-------|------|----------|
| 9/13/21 | E123-Consulting Services J.S. Held, LLC Inv#:1278635 Professional services rendered on 08/09/21 - 08/24/21. | | | 3,855.60 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|-----------------|
| Adam Garth | 17.5 | 250.00 | 4,375.00 |
| Total | 17.5 | | 4,375.00 |

| | |
|----------------------------|-----------------|
| Total Fees | 4,375.00 |
| Total Disbursements | 3,855.60 |

| | |
|------------------------------|--------------------|
| Total Current Charges | \$ 8,230.60 |
|------------------------------|--------------------|


28094-190

ADV. post

COHEN | VOLK
ECONOMIC CONSULTING GROUP

A PART OF JS|HELD

J.S. Held LLC



Invoice #: 1278835
Invoice Date: 2021-09-13
Due Date: 2021-10-13
Payment Terms: Net 30

Adam Garth
Lewis Brisbois Bisgaard & Smith LLP
6385 South Rainbow Blvd. Suite 600
Las Vegas Nevada 89118
United States

RECEIVED
SEP 14 2021

INVOICE

| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
|--------------|--|---------------|----------|
| 21061550 | Estate of Powell et al. v. Valley Health System LL | 62121341 | 62121341 |

Lewis Brisbois Bisgaard & Smith LLP

This Invoice Represents Your 100% Share

PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 1

Vendor: 87159 J.S. Held, LLC
Voucher: 2803713 Dist: 6797344
Approved by Stephen Vogel on 09/16/2021 9.30 AM

Doc ID: 0002YIMP-1
Date: 9/13/21
Check#: 345590

Page 1 of 5
Amount: 162,855.60

COHEN | VOLK
ECONOMIC CONSULTING GROUP

A PART OF JS|HELD

J.S. Held LLC



Invoice #: 1278635
Invoice Date: 2021-09-13
Due Date: 2021-10-13
Payment Terms: Net 30

Adam Garth
Lewis Brisbois Bisgaard & Smith LLP
6385 South Rainbow Blvd. Suite 600
Las Vegas Nevada 89118
United States

INVOICE

| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
|--------------|--|---------------|----------|
| 21061550 | Estate of Powell et al. v. Valley Health System LL | 62121341 | 62121341 |

| | |
|---------------------------------|-------------------|
| Professional Services Rendered: | \$3,780.00 |
| Expenses: | \$75.60 |
| Total This Invoice: | \$3,855.60 |

Rounding differences may exist compared to the detail pages.

TO ENSURE TIMELY PROCESSING PLEASE REMIT PAYMENT TO:

J.S. Held LLC



PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 2

COHEN | VOLK
ECONOMIC CONSULTING GROUP

A PART OF  J.S. HELD

J.S. Held LLC



Invoice #: 1278635
Invoice Date: 2021-09-13
Due Date: 2021-10-13
Payment Terms: Net 30

Adam Garth
Lewis Brisbois Bisgaard & Smith LLP
6385 South Rainbow Blvd. Suite 600
Las Vegas Nevada 89118
United States

INVOICE

| | | | |
|--------------|--|---------------|----------|
| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
| 21061550 | Estate of Powell et al. v. Valley Health System LL | 62121341 | 62121341 |

SUMMARY BY DEPARTMENT:

| DESCRIPTION | TIME | RATE | AMOUNT |
|--|------|----------|------------|
| Forensic Accounting & Economics | | | |
| Correspondence | 0.20 | \$450.00 | \$90.00 |
| Project Research | 1.60 | \$450.00 | \$720.00 |
| Reports | 6.60 | \$450.00 | \$2,970.00 |
| Forensic Accounting & Economics Total: | 8.40 | | \$3,780.00 |
| Total Professional Services Rendered: | 8.40 | | \$3,780.00 |

PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 3

Vendor: 87159 J.S. Held, LLC
Voucher: 2803713 Dist: 6797344
Approved by Stephen Vogel on 09/16/2021 9.30 AM

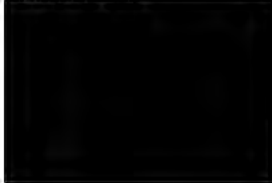
Doc ID: 0002YIMP-3
Date: 9/13/21
Check#: 345590

Page 3 of 5
Amount: 3,865.60
164

COHEN | VOLK
ECONOMIC CONSULTING GROUP

A PART OF  J.S. HELD

J.S. Held LLC



Invoice #: 1278635
Invoice Date: 2021-09-13
Due Date: 2021-10-13
Payment Terms: Net 30

Adam Garth
Lewis Brisbois Bisgaard & Smith LLP
6385 South Rainbow Blvd. Suite 600
Las Vegas Nevada 89118
United States

INVOICE

| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
|--------------|--|---------------|----------|
| 21061550 | Estate of Powell et al. v. Valley Health System LL | 62121341 | 62121341 |

DETAILS:

| DATE | DURATION | NOTES |
|-------------------------|-------------|---------------------------------|
| Correspondence | | |
| 8/9/2021 | 0.10 | Correspondence with law office. |
| 8/23/2021 | 0.10 | Correspondence with law office. |
| Project Research | | |
| 8/5/2021 | 0.80 | Research economic loss. |
| 8/10/2021 | 0.30 | Research economic loss. |
| 8/10/2021 | 0.40 | Research economic loss. |
| 8/11/2021 | 0.10 | Research economic loss. |
| Reports | | |
| 8/11/2021 | 3.70 | Prepare report. |
| 8/12/2021 | 0.50 | Prepare report. |
| 8/20/2021 | 1.80 | Prepare Rule 26 report. |
| 8/24/2021 | 0.40 | Prepare Rule 26 report. |
| 8/24/2021 | 0.20 | Prepare report. |
| TOTAL HOURS: | 8.40 | |

PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 4

Vendor: 87159 J.S. Held, LLC
Voucher: 2803713 Dist: 6797344
Approved by Stephen Vogel on 09/16/2021 9.30 AM

Doc ID: 0002YIMP-4
Date: 9/13/21
Check#: 345590

Page 4 of 5
Amount: 2,855.60
165

COHEN | VOLK
ECONOMIC CONSULTING GROUP

A PART OF  JS | HELD

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Invoice #: 1278635
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Due Date: 2021-10-13
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| OUR PROJECT# | PROJECT NAME | COURT CASE #: | CLAIM# |
|--------------|--|---------------|----------|
| 21061550 | Estate of Powell et al. v. Valley Health System LL | 62121341 | 62121341 |

EXPENSE SUMMARY:

| DATE | AMOUNT |
|--------------|---------|
| Other | |
| 9/13/2021 | \$75.60 |
| Total: Other | \$75.60 |
| Total | \$75.60 |

EXPENSE DETAILS:

| DATE | DESCRIPTION | AMOUNT |
|---------------|---------------------|---------|
| 9/13/2021 | File Administration | \$75.60 |
| TOTAL AMOUNT: | | \$75.60 |

PLEASE REFERENCE THE J.S. HELD INVOICE NUMBER WHEN REMITTING PAYMENT.

Page 5

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

November 9, 2021
Invoice No. 3129632

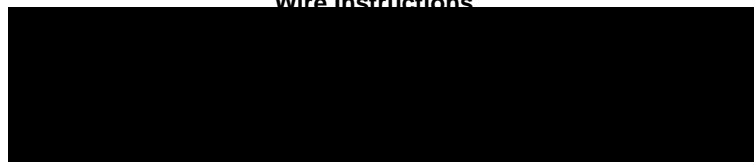
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 10/31/21 | 10,700.00 |
| Current Disbursements through 10/31/21 | 3,437.50 |
| Total Current Charges | \$ 14,137.50 |

*** Please return this page with your payment. ***

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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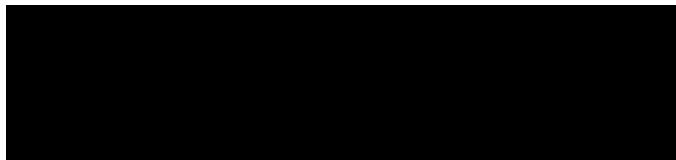
November 9, 2021
Invoice No. 3129632

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|--------------|
| Current Fees through 10/31/21 | 10,700.00 |
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| Total Current Charges | \$ 14,137.50 |

Wire Instructions



All Charges in US Dollars

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TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 11/09/21 3129632 Page 1 |
|---------------------|-----------|---|-------------------------------|
| Date | Atty | Description of Services Rendered | Hours |
| 10/01/21 | AG | Settlement/Non-Binding ADR: Draft/Revise: Continue preparation of mediation brief to incorporate all medical, legal and economic evidence. | 3.9 |
| 10/05/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare notice of trial conflict. | .3 |
| 10/07/21 | AG | Settlement/Non-Binding ADR: Draft/Revise: Continue preparation of mediation brief including all expert opinions, evaluations, damage assessments, liability assessment and legal issues pertaining to statute of limitations. | 3.6 |
| 10/08/21 | AG | Settlement/Non-Binding ADR: Draft/Revise: Continue mediation brief preparation and submission of draft to R. Kim for review. | 1.4 |
| 10/15/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze plaintiff's proposed stipulation to extend discovery deadlines. | .2 |
| 10/15/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Email to plaintiff's counsel regarding stipulation to extend discovery deadlines. | .1 |
| 10/18/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze decision from the Supreme Court granting our writ petition and ordering district court to enter an order granting our motion for summary judgment. | .3 |
| 10/18/21 | AG | Appellate Motions & Submissions: Communicate (With Client): Email to R. Kim regarding decision from Supreme Court and providing various strategies to employ pertaining thereto in terms of costs and fee recovery. | .4 |
| 10/18/21 | AG | Appellate Motions & Submissions: Communicate (Other Outside Counsel): Telephone call with co-defense counsel regarding strategy to pursue pertaining to future case handling, recovery of costs and potential issues for further appeal pertaining thereto. | .6 |
| 10/18/21 | AG | Appellate Motions & Submissions: Communicate (With Client): Review, analyze and respond to email from R. Kim regarding motion to publish and motion for costs and fees. | .1 |
| 10/18/21 | AG | Settlement/Non-Binding ADR: Communicate (Other External): Email to plaintiff's counsel regarding cancelation of mediation. | .1 |
| 10/18/21 | AG | Settlement/Non-Binding ADR: Communicate (Other External): Email JAMS regarding cancelation of mediation. | .2 |
| 10/18/21 | AG | Appellate Motions & Submissions: Research: Perform research to justify motion to publish per R. Kim authorization. | 1.3 |
| 10/18/21 | AG | Appellate Motions & Submissions: Draft/Revise: Prepare motion to publish per R. Kim pertaining to Supreme Court's decision granting writ on summary judgment motion. | 4.6 |
| 10/18/21 | SBV | Appellate Motions & Submissions: Review/Analyze: Analyze order granting petition for writ of mandamus and directing summary judgment be granted | .4 |
| 10/19/21 | AG | Appellate Motions & Submissions: Draft/Revise: Continue preparation of motion to publish order regarding writ of mandamus. | 1.6 |
| 10/19/21 | AG | Post-Trial Motions & Submissions: Research: Legal research pertaining to costs and fees pursuant to multiple statutes and cases permitting recovery therefrom, as well as per NRCP Rule 68 for purposes of moving for same after granting of summary judgment per writ of mandamus from Nevada Supreme Court. | 1.8 |
| 10/19/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Begin preparation of motion for costs and fees pursuant to multiple statutes and cases permitting recovery therefrom, as well as per NRCP Rule 68 after granting of summary judgment per writ of mandamus from Nevada Supreme Court. | 2.7 |
| 10/20/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Continue preparation of motion for costs and fees. | 3.8 |
| 10/21/21 | AG | Other Written Motions & Submiss.: Research: Legal research on sanctions for improper maintenance of lawsuit to obtain fees and costs to include in motion for same. | 1.4 |
| 10/21/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Continue preparation of motion for costs and | |

LEWIS BRISBOIS BISGAARD & SMITH LLP

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SUITE 4000
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LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|------------------------|-----------|---|-------------------------------|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 11/09/21 3129632 Page 2 |
|------------------------|-----------|---|-------------------------------|

| Date | Atty | Description of Services Rendered | Hours |
|----------|------|--|-------|
| | | fees on multiple statutory grounds and per local rules stemming from Supreme Court decision dismissing plaintiff's case. | 4.8 |
| 10/22/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Continue preparation of motion for costs, fees and sanctions. | 4.7 |
| 10/27/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Conduct analysis and prepare memorandum of costs for reimbursement of statutory costs to a prevailing party. | 1.7 |
| 10/27/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Continue preparation of motion for attorneys' fees and costs as well as sanctions. | 2.8 |

| Date | Description of Disbursement | Units | Rate | Amount |
|----------|---|-------|------|----------|
| 10/09/21 | Medical Expert Services Abraham Ishaaya Inv#:5POWELL Expert medical services rendered on 09/16/21 - 10/01/21. | | | 3,437.50 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|------------------|
| Adam Garth | 42.4 | 250.00 | 10,600.00 |
| S. Brent Vogel | .4 | 250.00 | 100.00 |
| Total | 42.8 | | 10,700.00 |

| | |
|----------------------------|------------------|
| Total Fees | 10,700.00 |
| Total Disbursements | 3,437.50 |

| | |
|------------------------------|---------------------|
| Total Current Charges | \$ 14,137.50 |
|------------------------------|---------------------|

28094-190

Abraham Ishaaya, M.D., F.C.C.P.



October 9, 2021

#5POWELL

LEWIS BRISBOIS
ATT: Adam Garth
6385 South Rainbow Blvd., Suite 600
Las Vegas, NV 89118

RE: CASE NAME: Estate of Rebecca Powell v Centennial Hills Hospital

Dear Adam:

Enclosed please find my charges to present for the above case.

Review of:

| | | |
|------|--|------------|
| 9-16 | Plaintiffs' 4 th supplement to initial designation of experts and pre-trial list of Witnesses | 2.5 hours |
| 9-20 | Telephone call | .5 hours |
| 9-22 | Literature review | 1.5 hours |
| 10-1 | Literature review | 1.75 hours |

Total hours: 6.25 hours @ \$550

Total owed: \$3,437.50

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'A. Ishaaya'.

Avi Ishaaya, M.D.

LEWIS BRISBOIS BISGAARD & SMITH LLP

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SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

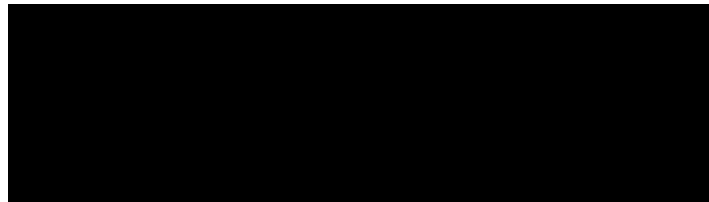
December 8, 2021
Invoice No. 3154450

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 11/30/21 | 2,826.50 |
| Current Disbursements through 11/30/21 | 3.50 |
| Total Current Charges | \$ 2,830.00 |

*** Please return this page with your payment. ***



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Attn: Richard Kim
Manager- Claims

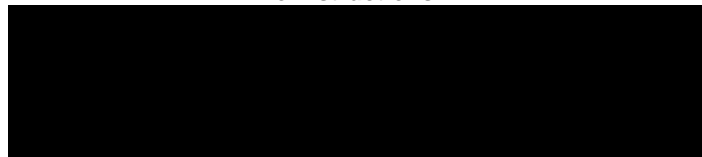
December 8, 2021
Invoice No. 3154450

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 11/30/21 | 2,826.50 |
| Current Disbursements through 11/30/21 | 3.50 |
| Total Current Charges | \$ 2,830.00 |

Wire Instructions



All Charges in US Dollars

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LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|--|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 12/08/21 3154450 Page 1 |
|-------------------------|------------------|---|--|

| Date | Atty | Description of Services Rendered | Hours |
|----------|------|---|-------|
| 11/09/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Prepare draft proposed order in accordance with Nevada Supreme Court's order granting writ petition to submit to district court on final hearing vacating prior order denying summary judgment and now granting all motions for summary judgment. | 1.7 |
| 11/09/21 | AG | Written Motions and Submissions: Communicate (Other Outside Counsel): Email to co-defense counsel regarding proposed order vacating prior order denying summary judgment and issuing order granting summary judgment. | .2 |
| 11/09/21 | AG | Other Written Motions & Submiss.: Communicate (Other Outside Counsel): Telephone call from co-defense counsel regarding strategy pertaining to order granting summary judgment and motions for costs and fees. | 1.1 |
| 11/09/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Email to all counsel with proposed order vacating prior denial of summary judgment and granting motions for summary judgment along with request for approval of same or we will submit to court without approval of respective counsel. | .2 |
| 11/09/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze plaintiff's motion in Nevada Supreme Court to reargue decision overturning denial of summary judgment. | .5 |
| 11/10/21 | AG | Analysis/Strategy: Communicate (With Client): Review, analyze and respond to email from R. Kim regarding status of motion for costs as well as updates on motion for rehearing, submission of memo of costs, motion for sanctions and fees, and strategy pertaining to each. | .4 |
| 11/12/21 | AG | Other Written Motions & Submiss.: Communicate (Other External): Email to all counsel requesting position on proposed order, and responses thereto including our refusal to agree to stay any enforcement of Supreme Court decision. | .2 |
| 11/12/21 | AG | Other Written Motions & Submiss.: Draft/Revise: Letter to court regarding proposed order pertaining to summary judgment as determined by Supreme Court. | .1 |
| 11/15/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze order from the Nevada supreme court denying plaintiffs' motion for rehearing. | .1 |
| 11/17/21 | SS | Analysis/Strategy: Plan & Prepare For: Analysis of Supreme Court decision, order, and Plaintiff's motion for rehearing in preparation for hearing in front of respondent Judge Weiss. | .9 |
| 11/18/21 | SS | Trial & Hearing Attendance: Appear For/Attend: Attended hearing on Supreme Court's decision to vacate district court's order denying Motion for Summary Judgment. | 1.2 |
| 11/19/21 | AG | Dispositive Motions: Review/Analyze: Review and analyze court's order vacating prior denial of summary judgment and granting motion for summary judgment. | .1 |
| 11/19/21 | AG | Dispositive Motions: Communicate (With Client): Email to R. Kim with order granting summary judgment and strategy for recoupment of costs and fees. | .1 |
| 11/19/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Continue preparation of motion for costs and fees. | 2.8 |
| 11/19/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Continue preparation of memorandum of costs. | .7 |
| 11/19/21 | AG | Written Motions and Submissions: Draft/Revise: Prepare notice of entry of order granting summary judgment. | .2 |
| 11/22/21 | SBV | Other Written Motions & Submiss.: Draft/Revise: Finalize Motion for Attorney's Fees | .4 |
| 11/23/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze Supreme Court order granting extension for plaintiff to file for en banc reconsideration. | .1 |
| 11/23/21 | AG | Appellate Motions & Submissions: Communicate (With Client): Email to R. Kim regarding implications of plaintiff's request for en banc reconsideration. | .2 |
| 11/23/21 | AG | Post-Trial Motions & Submissions: Review/Analyze: Review and analyze codefendants memorandum of costs and fees (43 pages). | .4 |

| Date | Description of Disbursement | Units | Rate | Amount |
|------|-----------------------------|-------|------|--------|
|------|-----------------------------|-------|------|--------|

DISBURSEMENTS MADE FOR YOUR ACCOUNT, FOR WHICH BILLS HAVE NOT YET BEEN RECEIVED,
WILL APPEAR ON A LATER STATEMENT

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

File Number SBV1 28094-190 UHS of Delaware, Inc.
Estate of Rebecca Powell v. Centennial Hills

12/08/21
3154450
Page 2

| Date | Description of Disbursement | Units | Rate | Amount |
|----------|---|-------|------|--------|
| 11/15/21 | Court filing fee Comerica Commercial Card Services Inv#:103121STMT-ANOUWELS Trans Date: 10/05/2021 Nvefile* 008666144-0, Filing fee for defendant Valley Health System, LLC dba Centennial Hills Hospital Medical Center's notice of trial conflict. | | | 3.50 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|-----------------|
| Adam Garth | 9.1 | 250.00 | 2,275.00 |
| S. Brent Vogel | .4 | 250.00 | 100.00 |
| Shady Sirsy | 2.1 | 215.00 | 451.50 |
| Total | 11.6 | | 2,826.50 |

Total Fees 2,826.50
Total Disbursements 3.50

Total Current Charges \$ 2,830.00

LEWIS BRISBOIS BISGAARD & SMITH LLP

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Attn: Richard Kim
Manager- Claims

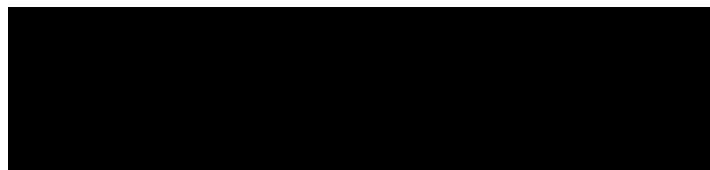
January 28, 2022
Invoice No. 3201187

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 12/31/21 | 7,975.00 |
| Current Disbursements through 12/31/21 | 10.50 |
| Total Current Charges | \$ 7,985.50 |

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All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

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Attn: Richard Kim
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January 28, 2022
Invoice No. 3201187

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Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

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|--|-------------|
| Current Fees through 12/31/21 | 7,975.00 |
| Current Disbursements through 12/31/21 | 10.50 |
| Total Current Charges | \$ 7,985.50 |

Wire Instructions



All Charges in US Dollars

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FEDERAL I.D. NO 95-3720522

| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 1/28/22 3201187 Page 1 |
|---------------------|-----------|--|------------------------------|
| Date | Atty | Description of Services Rendered | Hours |
| 12/02/21 | AG | Post-Trial Motions & Submissions: Communicate (Other External): Review, analyze and respond to email from plaintiff's counsel regarding motions for costs, fees and sanctions. | .2 |
| 12/02/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Prepare judgment for costs based upon previously filed memorandum of costs. | .8 |
| 12/02/21 | AG | Enforcement: Communicate (Other External): Review, analyze and respond to multiple emails with plaintiff's counsel regarding memorandum of costs and motion for costs, fees and sanctions. | .4 |
| 12/03/21 | AG | Enforcement: Communicate (Other External): Email to all counsel regarding proposed judgment on memoranda of costs. | .2 |
| 12/03/21 | AG | Enforcement: Communicate (Other Outside Counsel): Email to co-defense counsel and review and analyze response thereto pertaining to judgment on memos of costs. | .1 |
| 12/03/21 | AG | Enforcement: Communicate (Other External): Review, analyze and respond to plaintiff's counsel's email refusing to consent to judgment. | .1 |
| 12/03/21 | AG | Enforcement: Draft/Revise: Finalize judgment. | .2 |
| 12/07/21 | AG | Post-Trial Motions & Submissions: Review/Analyze: Review and analyze plaintiffs' motion to extend time to retax costs for purposes of preparing opposition game plan. | 1.1 |
| 12/07/21 | AG | Post-Trial Motions & Submissions: Research: Legal research for purposes of cite checking plaintiffs' motion to extend time to retax costs and obtaining countervailing authority thereto. | 1.4 |
| 12/08/21 | AG | Post-Trial Motions & Submissions: Research: Continue legal research regarding opposition to motion to retax costs and our counter-motion for costs and fees. | 1.7 |
| 12/08/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Prepare extensive opposition to plaintiffs' motion to retax costs and our counter-motion for fees and costs. | 6.8 |
| 12/09/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Continue preparation of opposition to plaintiffs' motion to extend time to retax costs. | 3.3 |
| 12/13/21 | SBV | Court Mandated Conferences: Review/Analyze: Analyze order setting status check regarding trial scheduling | .1 |
| 12/15/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze plaintiffs' motion for further extension of time to move for en banc reconsideration for purposes of preparing opposition to same. | .4 |
| 12/15/21 | AG | Appellate Motions & Submissions: Research: Legal research to oppose plaintiffs' motion to extend time to move for en banc reconsideration. | 1.3 |
| 12/15/21 | AG | Appellate Motions & Submissions: Draft/Revise: Prepare opposition to plaintiffs' motion for further extension of time to move for en banc reconsideration. | 2.8 |
| 12/15/21 | AG | Appellate Motions & Submissions: Communicate (Other Outside Counsel): Telephone call with co-defense counsel regarding strategy to join opposition to motion to extend time to file for en banc reconsideration. | .2 |
| 12/20/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze plaintiff's petition for en banc rehearing for purposes of determining issues raised potentially subject to reversal. | .8 |
| 12/20/21 | AG | Appellate Motions & Submissions: Review/Analyze: Review and analyze plaintiff's reply to our opposition for extension to file petition for en banc reconsideration. | .2 |
| 12/21/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze co-defendant's opposition to plaintiff's motion to extend time to retax costs. | .3 |
| 12/28/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze plaintiffs' reply to our opposition to motion to extend time to retax costs in preparation for developing countervailing authority. | .7 |
| 12/28/21 | AG | Other Written Motions & Submiss.: Research: Legal research to obtain countervailing authority and to cite check plaintiffs' reply in further support of their motion to extend time to | |

LEWIS BRISBOIS BISGAARD & SMITH LLP

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SUITE 4000
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LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 1/28/22 3201187 Page 2 |
|-------------------------|------------------|---|---|

| Date | Atty | Description of Services Rendered | Hours |
|----------|------|---|-------|
| | | retax costs | 1.1 |
| 12/28/21 | AG | Other Written Motions & Submiss.: Plan & Prepare For: Prepare outline and argument for hearing on plaintiffs' motion to extend time to retax costs. | 1.6 |
| 12/28/21 | AG | Other Written Motions & Submiss.: Review/Analyze: Review and analyze plaintiffs' opposition to our motion to attorneys' fees and costs in preparation for reply thereto. | 1.4 |
| 12/29/21 | AG | Post-Trial Motions & Submissions: Communicate (Other Outside Counsel): Telephone call with co-defense counsel regarding strategy pertaining to our replies on respective motions for attorneys' fees and costs. | .8 |
| 12/29/21 | AG | Post-Trial Motions & Submissions: Research: Legal research to obtain countervailing authority to plaintiffs' opposition to our motion for costs and fees to utilize on reply. | 1.7 |
| 12/29/21 | AG | Post-Trial Motions & Submissions: Draft/Revise: Begin preparation of reply in further support of motion for costs and fees. | 2.2 |

| Date | Description of Disbursement | Units | Rate | Amount |
|----------|--|-------|------|--------|
| 12/14/21 | Court filing fee Comerica Commercial Card Services Inv#:113021STMT-ANOUWELS Trans Date: 11/19/2021 Nvefile* 008913881-0, Filing fee for notice of entry of order. | | | 3.50 |
| 12/14/21 | Court filing fee Comerica Commercial Card Services Inv#:113021STMT-ANOUWELS Trans Date: 11/22/2021 Nvefile* 008918162-0, Filing fee for motion for attorney fees. | | | 3.50 |
| 12/14/21 | Court filing fee Comerica Commercial Card Services Inv#:113021STMT-ANOUWELS Trans Date: 11/22/2021 Nvefile* 008916433-0, Filing fee for memorandum of costs and disbursements. | | | 3.50 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|-----------------|
| Adam Garth | 31.8 | 250.00 | 7,950.00 |
| S. Brent Vogel | .1 | 250.00 | 25.00 |
| Total | 31.9 | | 7,975.00 |

| | |
|------------------------------|--------------------|
| Total Fees | 7,975.00 |
| Total Disbursements | 10.50 |
| Total Current Charges | \$ 7,985.50 |

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
King of Prussia, PA 19406

Attn: Richard Kim
Manager- Claims

February 15, 2022
Invoice No. 3217535

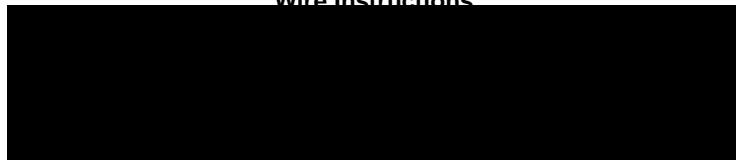
Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 01/31/22 | 4,925.00 |
| Current Disbursements through 01/31/22 | 4,678.50 |
| Total Current Charges | \$ 9,603.50 |

*** Please return this page with your payment. ***

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

UHS of Delaware, Inc.
367 South Gulph Road
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Attn: Richard Kim
Manager- Claims

February 15, 2022
Invoice No. 3217535

Re: Estate of Rebecca Powell v. Centennial Hills
Our File No.: 28094-190

Court CLAR
Court Case No. A-19-788787-C

| | |
|--|-------------|
| Current Fees through 01/31/22 | 4,925.00 |
| Current Disbursements through 01/31/22 | 4,678.50 |
| Total Current Charges | \$ 9,603.50 |

Wire Instructions



All Charges in US Dollars

LEWIS BRISBOIS BISGAARD & SMITH LLP

LAWYERS
SUITE 4000
633 W. FIFTH STREET
LOS ANGELES, CALIFORNIA 90071
TELEPHONE (213) 250-1800

FEDERAL I.D. NO 95-3720522

| | | | |
|-------------------------|------------------|---|---------------------------------------|
| File Number SBV1 | 28094-190 | UHS of Delaware, Inc. Estate of Rebecca Powell v. Centennial Hills | 2/15/22 3217535 Page 1 |
|-------------------------|------------------|---|---------------------------------------|

| Date | Atty | Description of Services Rendered | Hours |
|---------|------|--|-------|
| 1/03/22 | AG | Post-Trial Motions & Submissions: Research: Continue extensive legal research regarding supporting authority for sanctions, costs and fees pursuant to multiple statutes and court rules to incorporate into reply on motion for same. | 1.2 |
| 1/03/22 | AG | Post-Trial Motions & Submissions: Draft/Revise: Continued preparation of extensive reply in further support of motion for costs, fees, and sanctions against plaintiffs and counsel. | 8.8 |
| 1/04/22 | AG | Post-Trial Motions & Submissions: Draft/Revise: Continue preparation of reply in further support of motion for costs, fees and sanctions in response to plaintiff's opposition thereto. | 5.3 |
| 1/18/22 | AG | Post-Trial Motions & Submissions: Plan & Prepare For: Review and analyze plaintiffs' motion to extend time to retax costs, our opposition and plaintiffs' reply (approximately 200 pages) in preparation for oral argument and hearing on said motion. | 2.3 |
| 1/24/22 | AG | Post-Trial Motions & Submissions: Review/Analyze: Review and analyze court's decision on plaintiff's motion to extend time to move to retax costs for purposes of reporting on same and determining the strategy to pursue judgment. | .4 |
| 1/24/22 | AG | Analysis/Strategy: Communicate (With Client): Email to R. Kim along with decision on court's denial of plaintiff's motion to extend time to move to retax costs and implications thereof. | .3 |
| 1/25/22 | AG | Post-Trial Motions & Submissions: Draft/Revise: Prepare final order and notice of entry thereof denying plaintiff's motion to extend time to retax costs. | .8 |
| 1/25/22 | AG | Enforcement: Draft/Revise: Finalize judgment for Rule 68 costs per statute. | .4 |
| 1/25/22 | AG | Enforcement: Communicate (Other Outside Counsel): Review, analyze and respond to co-defense counsel regarding submission of judgment. | .2 |

| Date | Description of Disbursement | Units | Rate | Amount |
|---------|---|-------|------|----------|
| 8/06/21 | Medical Expert Services Abraham Ishaaya Inv#:4POWELL Expert medical services rendered on 07/29/21 - 08/04/21. | | | 4,675.00 |
| 1/14/22 | Court filing fee Comerica Commercial Card Services Inv#:123121STMT-ANOUWELS Trans Date: 12/20/2021 Nvefile* 009060440-0, Filing fee for opposition and countermotion. | | | 3.50 |

| Recap of Services | Hours | Effective Rate | Fees |
|-------------------|-------------|----------------|-----------------|
| Adam Garth | 19.7 | 250.00 | 4,925.00 |
| Total | 19.7 | | 4,925.00 |

| | |
|----------------------------|-----------------|
| Total Fees | 4,925.00 |
| Total Disbursements | 4,678.50 |

| | |
|------------------------------|--------------------|
| Total Current Charges | \$ 9,603.50 |
|------------------------------|--------------------|

28094-190

Abraham Ishaaya, M.D., F.C.C.P.



August 6, 2021

#4POWELL

LEWIS BRISBOIS

ATT: Adam Garth

6385 South Rainbow Blvd., Suite 600

Las Vegas, NV 89118

RE: CASE NAME: Estate of Rebecca Powell v Centennial Hills Hospital

Dear Adam:

Enclosed please find my charges to present for the above case.

| | | |
|------|---|----------|
| 7-29 | Preparation of responses to allegations | 3 hours |
| 7-31 | Preparation of responses to allegations | 3 hours |
| 8-1 | Preparation of responses to allegations | 2 hours |
| 8-4 | Review/edit document | .5 hours |
| | Telephone call | |

Total hours: 8.5 hours @ \$550

Total owed: \$4,675

If I can be of any further assistance, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'A. Ishaaya'.

Avi Ishaaya, M.D.

EXHIBIT F

1 **JUDG**

2 S. BRENT VOGEL

3 Nevada Bar No. 6858

4 Brent.Vogel@lewisbrisbois.com

5 ADAM GARTH

6 Nevada Bar No. 15045

7 Adam.Garth@lewisbrisbois.com

8 LEWIS BRISBOIS BISGAARD & SMITH LLP

9 6385 S. Rainbow Boulevard, Suite 600

10 Las Vegas, Nevada 89118

11 Telephone: 702.893.3383

12 Facsimile: 702.893.3789

13 *Attorneys for Defendant Valley Health System,*

14 *LLC dba Centennial Hills Hospital Medical*

15 *Center*

16 DISTRICT COURT

17 CLARK COUNTY, NEVADA

18 ESTATE OF REBECCA POWELL, through
19 BRIAN POWELL, as Special Administrator;
20 DARCI CREECY, individually and as Heir;
21 TARYN CREECY, individually and as an
22 Heir; ISALIAH KHOSROF, individually and as
23 an Heir; LLOYD CREECY, individually;

24 Plaintiffs,

25 vs.

26 VALLEY HEALTH SYSTEM, LLC (doing
27 business as "Centennial Hills Hospital Medical
28 Center"), a foreign limited liability company;
UNIVERSAL HEALTH SERVICES, INC., a
foreign corporation; DR. DIONICE S.
JULIANO, M.D., an individual; DR.
CONRADO C.D. CONCIO, M.D., an
individual; DR. VISHAL S. SHAH, M.D., an
individual; DOES 1-10; and ROES A-Z;

Defendants.

Case No. A-19-788787-C

Dept. No.: 30

**DEFENDANTS' JUDGMENT OF COSTS
PER NRS 18.020, 18.005, 18.110, 17.117,
and N.R.C.P. 68(f) AS AGAINST
PLAINTIFFS**

Pursuant to the Order granting Defendant Valley Health System, LLC's motion for summary judgment and co-defendants' joinder thereto dated and entered on November 19, 2021,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

That the Plaintiffs, take nothing, and that the action be dismissed on the merits.

1 Defendants Valley Health System, LLC shall be awarded their reasonable Costs pursuant to
2 NRS 18.020, 18.005, 18.110, 17.117, and N.R.C.P. 68(f) in the amount of **\$42,492.03** in accordance
3 with the Verified Memorandum of Costs attached hereto as **Exhibit A**. Valley Health Systems,
4 LLC submitted a motion currently pending for additional costs and attorneys fees, the results of
5 which may result in an additional Judgment for such costs and fees should it be granted in whole or
6 part.

7 Defendants Conrado C.D. Concio, M.D. and Vishal S. Shah, M.D. shall separately be
8 awarded their reasonable Costs pursuant to NRS 18.020, 18.005, 18.110, 17.117, and N.R.C.P. 68(f)
9 in the amount of **\$9,149.76** in accordance with the Verified Memorandum of Costs attached hereto
10 as **Exhibit B**. Conrado C.D. Concio, M.D. and Vishal S. Shah, M.D. will be submitting a motion
11 for additional costs and attorneys fees, the results of which may result in an additional Judgment for
12 such costs and fees should it be granted in whole or part.

13 DATED this 3rd day of December, 2021.

14
15
16

DISTRICT COURT JUDGE

17 Respectfully Submitted By:
18 LEWIS BRISBOIS BISGAARD & SMITH LLP

19
20 By /s/ Adam Garth
21 S. BRENT VOGEL
22 Nevada Bar No. 6858
23 ADAM GARTH
24 Nevada Bar No. 15045
25 6385 S. Rainbow Boulevard, Suite 600
26 Las Vegas, Nevada 89118
27 Tel. 702.893.3383
28 *Attorneys for Attorneys for Defendant Valley
Health System, LLC dba Centennial Hills Hospital
Medical Center*

///

///

1 Agreed as to form and substance by:

2
3
4
5
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7
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Refused to sign

/s/ Brad Shipley

Paul S. Padda, Esq.
Srilata Shah, Esq.
PAUL PADDA LAW, PLLC
4560 S. Decatur Blvd., Suite 300
Las Vegas, NV 89103
Tel: 702.366.1888
Fax: 702.366.1940
psp@paulpaddalaw.com
Attorneys for Plaintiffs

John H. Cotton, Esq.
Brad Shipley, Esq.
JOHN. H. COTTON &
ASSOCIATES
7900 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
Tel: 702.832.5909
Fax: 702.832.5910
jhcotton@jhcottonlaw.com
bshipleyr@jhcottonlaw.com
*Attorneys for Defendants Dionice S.
Juliano, M.D., Conrado Concio,
M.D And Vishal S. Shah, M.D.*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 3rd day of December, 2021, a true and correct copy
3 of **DEFENDANT VALLEY HEALTH SYSTEM LLC'S VERIFIED MEMORANDUM OF**
4 **COSTS** was served by electronically filing with the Clerk of the Court using the Odyssey E-File &
5 Serve system and serving all parties with an email-address on record, who have agreed to receive
6 electronic service in this action.

7 Paul S. Padda, Esq.
8 PAUL PADDALAW, PLLC
9 4560 S. Decatur Blvd., Suite 300
10 Las Vegas, NV 89103
11 Tel: 702.366.1888
12 Fax: 702.366.1940
13 psp@paulpaddalaw.com
14 *Attorneys for Plaintiffs*

John H. Cotton, Esq.
Brad Shipley, Esq.
JOHN. H. COTTON & ASSOCIATES
7900 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
Tel: 702.832.5909
Fax: 702.832.5910
jhcotton@jhcottonlaw.com
bshipleyr@jhcottonlaw.com
Attorneys for Defendants Dionice S. Juliano,
M.D., Conrado Concio, M.D And Vishal S.
Shah, M.D.

15
16
17 By /s/ Tiffany Dube
18 An Employee of
19 LEWIS BRISBOIS BISGAARD & SMITH LLP
20
21
22
23
24
25
26
27
28

Gonzales, Emma

From: Dube, Tiffany
Sent: Friday, December 3, 2021 1:06 PM
To: Gonzales, Emma
Subject: FW: Powell v. Centennial Hills - Proposed Judgment

From: Paul Padda <psp@paulpaddalaw.com>
Sent: Friday, December 3, 2021 9:15 AM
To: Garth, Adam <Adam.Garth@lewisbrisbois.com>; Srilata Shah <sri@paulpaddalaw.com>; Brad Shipley <bshipley@jhcottonlaw.com>
Cc: Vogel, Brent <Brent.Vogel@lewisbrisbois.com>; Sirsy, Shady <Shady.Sirsy@lewisbrisbois.com>; Dube, Tiffany <Tiffany.Dube@lewisbrisbois.com>; San Juan, Maria <Maria.SanJuan@lewisbrisbois.com>
Subject: RE: Powell v. Centennial Hills - Proposed Judgment

You do not have our consent. Thanks.

Paul S. Padda, Esq.
PAUL PADDA LAW, PLLC
Websites: paulpaddalaw.com

Nevada Office:
4560 South Decatur Blvd., Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888

California Office:
One California Plaza
300 South Grand Avenue, Suite 3840
Los Angeles, California 90071
Tele: (213) 423-7788



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From: Garth, Adam <Adam.Garth@lewisbrisbois.com>
Sent: Friday, December 3, 2021 9:11 AM
To: Srilata Shah <sri@paulpaddalaw.com>; Brad Shipley <bshipley@jhcottonlaw.com>
Cc: Vogel, Brent <Brent.Vogel@lewisbrisbois.com>; Sirsy, Shady <Shady.Sirsy@lewisbrisbois.com>; Dube, Tiffany <Tiffany.Dube@lewisbrisbois.com>; San Juan, Maria <Maria.SanJuan@lewisbrisbois.com>; Paul Padda <psp@paulpaddalaw.com>
Subject: Powell v. Centennial Hills - Proposed Judgment
Importance: High

Counsel,

Attached is a proposed judgment which we intend to submit to Judge Wiese for signature on Monday, December 6, 2021. We have also attached the respective memos of costs for your quick reference as well. This will not be the final amount of any judgment, only those statutory costs to which we are entitled based upon the memorandum of costs served by the respective defendants. Should our future motion for additional costs, fees and sanctions be granted, now scheduled to be heard on January 19, an additional judgment for amounts not covered hereunder will be filed at that time.

Please indicate whether we have your consent to use your e-signature on this judgment. If we do not receive an email regarding your position on the proposed judgment by 5:00 p.m. today, we will submit it for signature as indicated above, noting counsel's refusal to sign.

Adam Garth



Adam Garth
Partner
Adam.Garth@lewisbrisbois.com

T: 702.693.4335 F: 702.366.9563

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | LewisBrisbois.com

Representing clients from coast to coast. [View our locations nationwide.](#)

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Gonzales, Emma

From: Dube, Tiffany
Sent: Friday, December 3, 2021 1:06 PM
To: Gonzales, Emma
Subject: FW: Powell v. Centennial Hills - Proposed Judgment

From: Brad Shipley <bshipley@jhcottonlaw.com>
Sent: Friday, December 3, 2021 9:13 AM
To: Garth, Adam <Adam.Garth@lewisbrisbois.com>; Srilata Shah <sri@paulpaddalaw.com>
Cc: Vogel, Brent <Brent.Vogel@lewisbrisbois.com>; Sirsy, Shady <Shady.Sirsy@lewisbrisbois.com>; Jody Foote <jfoote@jhcottonlaw.com>; Dube, Tiffany <Tiffany.Dube@lewisbrisbois.com>; San Juan, Maria <Maria.SanJuan@lewisbrisbois.com>; Paul Padda <psp@paulpaddalaw.com>
Subject: RE: Powell v. Centennial Hills - Proposed Judgment

We agree as to content and form. Thank you for drafting. Please use my e-signature for the submission.

Brad Shipley, Esq.
John H. Cotton & Associates, Ltd.
7900 W. Sahara ave. #200
Las Vegas, NV 89117
bshipley@jhcottonlaw.com
702 832 5909

From: Garth, Adam <Adam.Garth@lewisbrisbois.com>
Sent: Friday, December 3, 2021 9:11 AM
To: Srilata Shah <sri@paulpaddalaw.com>; Brad Shipley <bshipley@jhcottonlaw.com>
Cc: Vogel, Brent <Brent.Vogel@lewisbrisbois.com>; Sirsy, Shady <Shady.Sirsy@lewisbrisbois.com>; Dube, Tiffany <Tiffany.Dube@lewisbrisbois.com>; San Juan, Maria <Maria.SanJuan@lewisbrisbois.com>; Paul Padda <psp@paulpaddalaw.com>
Subject: Powell v. Centennial Hills - Proposed Judgment
Importance: High

Counsel,

Attached is a proposed judgment which we intend to submit to Judge Wiese for signature on Monday, December 6, 2021. We have also attached the respective memos of costs for your quick reference as well. This will not be the final amount of any judgment, only those statutory costs to which we are entitled based upon the memorandum of costs served by the respective defendants. Should our future motion for additional costs, fees and sanctions be granted, now scheduled to be heard on January 19, an additional judgment for amounts not covered hereunder will be filed at that time.

Please indicate whether we have your consent to use your e-signature on this judgment. If we do not receive an email regarding your position on the proposed judgment by 5:00 p.m. today, we will submit it for signature as indicated above, noting counsel's refusal to sign.

Adam Garth



Adam Garth

Partner

Adam.Garth@lewisbrisbois.com

T: 702.693.4335 F: 702.366.9563

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | LewisBrisbois.com

Representing clients from coast to coast. View our locations nationwide.

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EXHIBIT G

From: [Dube, Tiffany](#)
To: dc30inbox@clarkcountycourts.us
Cc: [Garth, Adam](#); psp@paulpaddalaw.com; jhctton@jhcottonlaw.com; bshipleyr@jhcottonlaw.com
Subject: Defendants' Judgment of Costs per NRS 18.020 18.005 18.110 17.117 and N.R.C.P 68(f) as Against Plaintiffs
Date: Friday, December 3, 2021 2:20:01 PM
Attachments: [image001.png](#)
[Defendants' Judgment of Costs per NRS 18.020 18.005 18.110 17.117 and N.R.C.P. 68\(f\) as Against Plaintiffs.pdf](#)

Please see attached Defendants' Judgment of Costs per NRS 18.020 18.005 18.110 17.117 and N.R.C.P 68(f) as Against Plaintiffs for Judge's review and signature.

Tiffany Dube

Legal Secretary to Adam Garth and Shady Sirsy

Tiffany.Dube@lewisbrisbois.com

Tel: (702) 693-4353 Fax: (702) 893-3789

6385 S. Rainbow Blvd. Suite 600 Las Vegas, Nevada 89118 | LewisBrisbois.com

Representing clients from coast to coast. View our nationwide locations.

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1 **JUDG**

2 S. BRENT VOGEL

3 Nevada Bar No. 6858

4 Brent.Vogel@lewisbrisbois.com

5 ADAM GARTH

6 Nevada Bar No. 15045

7 Adam.Garth@lewisbrisbois.com

8 LEWIS BRISBOIS BISGAARD & SMITH LLP

9 6385 S. Rainbow Boulevard, Suite 600

10 Las Vegas, Nevada 89118

11 Telephone: 702.893.3383

12 Facsimile: 702.893.3789

13 *Attorneys for Defendant Valley Health System,*

14 *LLC dba Centennial Hills Hospital Medical*

15 *Center*

16 DISTRICT COURT

17 CLARK COUNTY, NEVADA

18 ESTATE OF REBECCA POWELL, through
19 BRIAN POWELL, as Special Administrator;
20 DARCI CREECY, individually and as Heir;
21 TARYN CREECY, individually and as an
22 Heir; ISALIAH KHOSROF, individually and as
23 an Heir; LLOYD CREECY, individually;

24 Plaintiffs,

25 vs.

26 VALLEY HEALTH SYSTEM, LLC (doing
27 business as "Centennial Hills Hospital Medical
28 Center"), a foreign limited liability company;
UNIVERSAL HEALTH SERVICES, INC., a
foreign corporation; DR. DIONICE S.
JULIANO, M.D., an individual; DR.
CONRADO C.D. CONCIO, M.D., an
individual; DR. VISHAL S. SHAH, M.D., an
individual; DOES 1-10; and ROES A-Z;

Defendants.

Case No. A-19-788787-C

Dept. No.: 30

**DEFENDANTS' JUDGMENT OF COSTS
PER NRS 18.020, 18.005, 18.110, 17.117,
and N.R.C.P. 68(f) AS AGAINST
PLAINTIFFS**

Pursuant to the Order granting Defendant Valley Health System, LLC's motion for summary judgment and co-defendants' joinder thereto dated and entered on November 19, 2021,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

That the Plaintiffs, take nothing, and that the action be dismissed on the merits.

1 Defendants Valley Health System, LLC shall be awarded their reasonable Costs pursuant to
2 NRS 18.020, 18.005, 18.110, 17.117, and N.R.C.P. 68(f) in the amount of **\$42,492.03** in accordance
3 with the Verified Memorandum of Costs attached hereto as **Exhibit A**. Valley Health Systems,
4 LLC submitted a motion currently pending for additional costs and attorneys fees, the results of
5 which may result in an additional Judgment for such costs and fees should it be granted in whole or
6 part.

7 Defendants Conrado C.D. Concio, M.D. and Vishal S. Shah, M.D. shall separately be
8 awarded their reasonable Costs pursuant to NRS 18.020, 18.005, 18.110, 17.117, and N.R.C.P. 68(f)
9 in the amount of **\$9,149.76** in accordance with the Verified Memorandum of Costs attached hereto
10 as **Exhibit B**. Conrado C.D. Concio, M.D. and Vishal S. Shah, M.D. will be submitting a motion
11 for additional costs and attorneys fees, the results of which may result in an additional Judgment for
12 such costs and fees should it be granted in whole or part.

13 DATED this 3rd day of December, 2021.

14
15 _____
16 DISTRICT COURT JUDGE

17 Respectfully Submitted By:
18 LEWIS BRISBOIS BISGAARD & SMITH LLP

19
20 By /s/ Adam Garth
21 S. BRENT VOGEL
22 Nevada Bar No. 6858
23 ADAM GARTH
24 Nevada Bar No. 15045
25 6385 S. Rainbow Boulevard, Suite 600
26 Las Vegas, Nevada 89118
27 Tel. 702.893.3383
28 *Attorneys for Attorneys for Defendant Valley
Health System, LLC dba Centennial Hills Hospital
Medical Center*

///

///

1 Agreed as to form and substance by:

2
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Refused to sign

/s/ Brad Shipley

Paul S. Padda, Esq.
Srilata Shah, Esq.
PAUL PADDA LAW, PLLC
4560 S. Decatur Blvd., Suite 300
Las Vegas, NV 89103
Tel: 702.366.1888
Fax: 702.366.1940
psp@paulpaddalaw.com
Attorneys for Plaintiffs

John H. Cotton, Esq.
Brad Shipley, Esq.
JOHN. H. COTTON &
ASSOCIATES
7900 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
Tel: 702.832.5909
Fax: 702.832.5910
jhcotton@jhcottonlaw.com
bshipleyr@jhcottonlaw.com
*Attorneys for Defendants Dionice S.
Juliano, M.D., Conrado Concio,
M.D And Vishal S. Shah, M.D.*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 3rd day of December, 2021, a true and correct copy
3 of **DEFENDANT VALLEY HEALTH SYSTEM LLC'S VERIFIED MEMORANDUM OF**
4 **COSTS** was served by electronically filing with the Clerk of the Court using the Odyssey E-File &
5 Serve system and serving all parties with an email-address on record, who have agreed to receive
6 electronic service in this action.

7 Paul S. Padda, Esq.
8 PAUL PADDALAW, PLLC
9 4560 S. Decatur Blvd., Suite 300
10 Las Vegas, NV 89103
11 Tel: 702.366.1888
12 Fax: 702.366.1940
13 psp@paulpaddalaw.com
14 *Attorneys for Plaintiffs*

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Brad Shipley, Esq.
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Las Vegas, NV 89117
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jhcotton@jhcottonlaw.com
bshipleyr@jhcottonlaw.com
Attorneys for Defendants Dionice S. Juliano,
M.D., Conrado Concio, M.D And Vishal S.
Shah, M.D.

15
16
17 By /s/ Tiffany Dube
18 An Employee of
19 LEWIS BRISBOIS BISGAARD & SMITH LLP
20
21
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23
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Gonzales, Emma

From: Dube, Tiffany
Sent: Friday, December 3, 2021 1:06 PM
To: Gonzales, Emma
Subject: FW: Powell v. Centennial Hills - Proposed Judgment

From: Paul Padda <psp@paulpaddalaw.com>
Sent: Friday, December 3, 2021 9:15 AM
To: Garth, Adam <Adam.Garth@lewisbrisbois.com>; Srilata Shah <sri@paulpaddalaw.com>; Brad Shipley <bshipley@jhcottonlaw.com>
Cc: Vogel, Brent <Brent.Vogel@lewisbrisbois.com>; Sirsy, Shady <Shady.Sirsy@lewisbrisbois.com>; Dube, Tiffany <Tiffany.Dube@lewisbrisbois.com>; San Juan, Maria <Maria.SanJuan@lewisbrisbois.com>
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You do not have our consent. Thanks.

Paul S. Padda, Esq.
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Websites: paulpaddalaw.com

Nevada Office:
4560 South Decatur Blvd., Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888

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One California Plaza
300 South Grand Avenue, Suite 3840
Los Angeles, California 90071
Tele: (213) 423-7788



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Importance: High

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Adam Garth



Adam Garth
Partner
Adam.Garth@lewisbrisbois.com

T: 702.693.4335 F: 702.366.9563

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | LewisBrisbois.com

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We agree as to content and form. Thank you for drafting. Please use my e-signature for the submission.

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From: [Garth, Adam](#)
To: [McBride, Angela](#); [Israelitt, Megan](#); [Vogel, Brent](#); [Brad Shipley \(bshipley@jhcottonlaw.com\)](#); [San Juan, Maria](#); [Sirsy, Shady](#); ["Diana Escobedo"](#); ["Cormier"](#); [DeSario, Kimberly](#); ["psp@paulpaddalaw.com"](#); [Brown, Heidi](#)
Cc: [Israelitt, Megan](#)
Subject: RE: Estate of Rebecca Powell v. Valley Health Systems et al.; 2/9/22 HEARING RESET TO 2/18/22 CHAMBERS
Date: Tuesday, February 8, 2022 2:26:45 PM
Attachments: [The Estate of Powell v. Centennial Hills - Case No. A-19-788787-C.msg](#)

Confirmed. We are also checking on the judgment we submitted to Judge Wiese on January 26, 2022 which has not been signed. Attached is the email sent that day along with the proposed joint judgment of the defendants. Kindly advise when we can expect to hear from the Court concerning same, given that plaintiff's motion to retax was denied by the Court, thereby clearing the way for the judgment.

Adam Garth

Adam Garth

Partner

Las Vegas Rainbow

702.693.4335 or x7024335

From: McBride, Angela <McBrideA@clarkcountycourts.us>
Sent: Tuesday, February 8, 2022 2:17 PM
To: Israelitt, Megan <Dept30LC@clarkcountycourts.us>; Vogel, Brent <Brent.Vogel@lewisbrisbois.com>; Brad Shipley (bshipley@jhcottonlaw.com) <bshipley@jhcottonlaw.com>; 'Roya.Rokni@lewisbrisbois.com' <Roya.Rokni@lewisbrisbois.com>; San Juan, Maria <Maria.SanJuan@lewisbrisbois.com>; Sirsy, Shady <Shady.Sirsy@lewisbrisbois.com>; 'Diana Escobedo' <diana@paulpaddalaw.com>; 'Cormier' <karen@paulpaddalaw.com>; Dube, Tiffany <Tiffany.Dube@lewisbrisbois.com>; DeSario, Kimberly <Kimberly.DeSario@lewisbrisbois.com>; Garth, Adam <Adam.Garth@lewisbrisbois.com>; 'psp@paulpaddalaw.com' <psp@paulpaddalaw.com>
Cc: McBride, Angela <McBrideA@clarkcountycourts.us>; Israelitt, Megan <Dept30LC@clarkcountycourts.us>
Subject: [EXT] RE: Estate of Rebecca Powell v. Valley Health Systems et al.; 2/9/22 HEARING RESET TO 2/18/22 CHAMBERS

Counsel,

Please be advised that, for the purpose of judicial economy, Defendant Valley Health System, LLC DBA Centennial Hills Hospital Medical Center's Motion for Attorneys' Fees Pursuant to N.R.C.P. 68, N.R.S. 17.117, 7.085, 18.010(2), and EDCR 7.60 and Defendants Conrado Concio, MD and Vishal Shah, MD's Motion for Attorneys' Fees and Costs, currently set for hearing on 2/9/22 at 9AM have **been RESET to be decided IN CHAMBERS on 2/18/22.**

This email shall serve as your notice of the same.

Angela McBride

Judicial Executive Assistant

To the Honorable Jerry A. Wiese II

mcbridea@clarkcountycourts.us

(702) 671-3633

Department XXX

From: [Brown, Heidi](#)
To: dc30inbox@clarkcountycourts.us
Cc: psp@paulpaddalaw.com; tony@thevegslawyers.com; civil@paulpaddalaw.com; shelbi@paulpaddalaw.com; diana@paulpaddalaw.com; sri@paulpaddalaw.com; karen@paulpaddalaw.com; [San Juan, Maria](#); [Garth, Adam](#); [San Juan, Maria](#); [DeSario, Kimberly](#); [Dube, Tiffany](#); [Vogel, Brent](#); jfoote@jhcottonlaw.com; jpincombe@jhcottonlaw.com; jhcotton@jhcottonlaw.com; bshipley@jhcottonlaw.com
Subject: The Estate of Powell v. Centennial Hills - Case No. A-19-788787-C
Date: Wednesday, January 26, 2022 12:36:17 PM
Attachments: [image001.png](#)
[Defendants" Judgment of Costs per NRS 18.020 18.005 18.110 17.117 and N.R.C.P. 68\(f\) as Against Plaintiffs.pdf](#)
[Powell v Valley - CHH's Judgment for Costs.docx](#)

Dear Judge Weiss,

Attached please find the Defendants' Judgment of Costs per NRS 18.020, 18.005, 18.110, 17.117, and NRCP 68(f) as Against Plaintiff's for your review and consideration. Thank you.

Heidi Brown
Legal Secretary to
Nausheen Peters
Lawrence Balanovsky
heidi.brown@lewisbrisbois.com
T: 702.693.1716 F: 702.893.3789
6385 S. Rainbow Blvd. Suite 600 Las Vegas, Nevada 89118 | LewisBrisbois.com
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1 **JUDG**

2 S. BRENT VOGEL

3 Nevada Bar No. 6858

4 Brent.Vogel@lewisbrisbois.com

5 ADAM GARTH

6 Nevada Bar No. 15045

7 Adam.Garth@lewisbrisbois.com

8 LEWIS BRISBOIS BISGAARD & SMITH LLP

9 6385 S. Rainbow Boulevard, Suite 600

10 Las Vegas, Nevada 89118

11 Telephone: 702.893.3383

12 Facsimile: 702.893.3789

13 *Attorneys for Defendant Valley Health System,*

14 *LLC dba Centennial Hills Hospital Medical*

15 *Center*

16 DISTRICT COURT

17 CLARK COUNTY, NEVADA

18 ESTATE OF REBECCA POWELL, through
19 BRIAN POWELL, as Special Administrator;
20 DARCI CREECY, individually and as Heir;
21 TARYN CREECY, individually and as an
22 Heir; ISALIAH KHOSROF, individually and as
23 an Heir; LLOYD CREECY, individually;

24 Plaintiffs,

25 vs.

26 VALLEY HEALTH SYSTEM, LLC (doing
27 business as "Centennial Hills Hospital Medical
28 Center"), a foreign limited liability company;
UNIVERSAL HEALTH SERVICES, INC., a
foreign corporation; DR. DIONICE S.
JULIANO, M.D., an individual; DR.
CONRADO C.D. CONCIO, M.D., an
individual; DR. VISHAL S. SHAH, M.D., an
individual; DOES 1-10; and ROES A-Z;

Defendants.

Case No. A-19-788787-C

Dept. No.: 30

**DEFENDANTS' JUDGMENT OF COSTS
PER NRS 18.020, 18.005, 18.110, 17.117,
and N.R.C.P. 68(f) AS AGAINST
PLAINTIFFS**

Pursuant to the Order granting Defendant Valley Health System, LLC's motion for summary judgment and co-defendants' joinder thereto dated and entered on November 19, 2021,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

That the Plaintiffs, take nothing, and that the action be dismissed on the merits.

1 Defendants Valley Health System, LLC shall be awarded their reasonable Costs pursuant to
2 NRS 18.020, 18.005, 18.110, 17.117, and N.R.C.P. 68(f) in the amount of **\$42,492.03** in accordance
3 with the Verified Memorandum of Costs attached hereto as **Exhibit A**. Valley Health Systems,
4 LLC submitted a motion currently pending for additional costs and attorneys fees, the results of
5 which may result in an additional Judgment for such costs and fees should it be granted in whole or
6 part.

7 Defendants Conrado C.D. Concio, M.D. and Vishal S. Shah, M.D. shall separately be
8 awarded their reasonable Costs pursuant to NRS 18.020, 18.005, 18.110, 17.117, and N.R.C.P. 68(f)
9 in the amount of **\$9,149.76** in accordance with the Verified Memorandum of Costs attached hereto
10 as **Exhibit B**. Conrado C.D. Concio, M.D. and Vishal S. Shah, M.D. will be submitting a motion
11 for additional costs and attorneys fees, the results of which may result in an additional Judgment for
12 such costs and fees should it be granted in whole or part.

13 DATED this 3rd day of December, 2021.

14
15 _____
16 DISTRICT COURT JUDGE

17 Respectfully Submitted By:
18 LEWIS BRISBOIS BISGAARD & SMITH LLP

19
20 By /s/ Adam Garth
21 S. BRENT VOGEL
22 Nevada Bar No. 6858
23 ADAM GARTH
24 Nevada Bar No. 15045
25 6385 S. Rainbow Boulevard, Suite 600
26 Las Vegas, Nevada 89118
27 Tel. 702.893.3383
28 *Attorneys for Attorneys for Defendant Valley
Health System, LLC dba Centennial Hills Hospital
Medical Center*

27 ///

28 ///

1 Agreed as to form and substance by:

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Refused to sign

/s/ Brad Shipley

Paul S. Padda, Esq.
Srilata Shah, Esq.
PAUL PADDA LAW, PLLC
4560 S. Decatur Blvd., Suite 300
Las Vegas, NV 89103
Tel: 702.366.1888
Fax: 702.366.1940
psp@paulpaddalaw.com
Attorneys for Plaintiffs

John H. Cotton, Esq.
Brad Shipley, Esq.
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ASSOCIATES
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jhcotton@jhcottonlaw.com
bshipleyr@jhcottonlaw.com
*Attorneys for Defendants Dionice S.
Juliano, M.D., Conrado Concio,
M.D And Vishal S. Shah, M.D.*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 3rd day of December, 2021, a true and correct copy
3 of **DEFENDANT VALLEY HEALTH SYSTEM LLC'S VERIFIED MEMORANDUM OF**
4 **COSTS** was served by electronically filing with the Clerk of the Court using the Odyssey E-File &
5 Serve system and serving all parties with an email-address on record, who have agreed to receive
6 electronic service in this action.

7 Paul S. Padda, Esq.
8 PAUL PADDALAW, PLLC
9 4560 S. Decatur Blvd., Suite 300
10 Las Vegas, NV 89103
11 Tel: 702.366.1888
12 Fax: 702.366.1940
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14 *Attorneys for Plaintiffs*

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You do not have our consent. Thanks.

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Partner

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5 ADAM GARTH

6 Nevada Bar No. 15045

7 Adam.Garth@lewisbrisbois.com

8 LEWIS BRISBOIS BISGAARD & SMITH LLP

9 6385 S. Rainbow Boulevard, Suite 600

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11 Telephone: 702.893.3383

12 Facsimile: 702.893.3789

13 *Attorneys for Defendant Valley Health System,*

14 *LLC dba Centennial Hills Hospital Medical*

15 *Center*

16 DISTRICT COURT

17 CLARK COUNTY, NEVADA

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20 DARCI CREECY, individually and as Heir;
21 TARYN CREECY, individually and as an
22 Heir; ISALIAH KHOSROF, individually and as
23 an Heir; LLOYD CREECY, individually;

24 Plaintiffs,

25 vs.

26 VALLEY HEALTH SYSTEM, LLC (doing
27 business as "Centennial Hills Hospital Medical
28 Center"), a foreign limited liability company;
UNIVERSAL HEALTH SERVICES, INC., a
foreign corporation; DR. DIONICE S.
JULIANO, M.D., an individual; DR.
CONRADO C.D. CONCIO, M.D., an
individual; DR. VISHAL S. SHAH, M.D., an
individual; DOES 1-10; and ROES A-Z;

Defendants.

Case No. A-19-788787-C

Dept. No.: 30

**DEFENDANTS' JUDGMENT OF COSTS
PER NRS 18.020, 18.005, 18.110, 17.117,
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2 NRS 18.020, 18.005, 18.110, 17.117, and N.R.C.P. 68(f) in the amount of **\$42,492.03** in accordance
3 with the Verified Memorandum of Costs attached hereto as **Exhibit A**. Valley Health Systems,
4 LLC submitted a motion currently pending for additional costs and attorneys fees, the results of
5 which may result in an additional Judgment for such costs and fees should it be granted in whole or
6 part.

7 Defendants Conrado C.D. Concio, M.D. and Vishal S. Shah, M.D. shall separately be
8 awarded their reasonable Costs pursuant to NRS 18.020, 18.005, 18.110, 17.117, and N.R.C.P. 68(f)
9 in the amount of **\$9,149.76** in accordance with the Verified Memorandum of Costs attached hereto
10 as **Exhibit B**. Conrado C.D. Concio, M.D. and Vishal S. Shah, M.D. will be submitting a motion
11 for additional costs and attorneys fees, the results of which may result in an additional Judgment for
12 such costs and fees should it be granted in whole or part.

13 DATED this 3rd day of December, 2021.

14
15 _____
16 DISTRICT COURT JUDGE

17 Respectfully Submitted By:
18 LEWIS BRISBOIS BISGAARD & SMITH LLP

19
20 By /s/ Adam Garth
21 S. BRENT VOGEL
22 Nevada Bar No. 6858
23 ADAM GARTH
24 Nevada Bar No. 15045
25 6385 S. Rainbow Boulevard, Suite 600
26 Las Vegas, Nevada 89118
27 Tel. 702.893.3383
28 *Attorneys for Attorneys for Defendant Valley
Health System, LLC dba Centennial Hills Hospital
Medical Center*

27 ///

28 ///

1 Agreed as to form and substance by:

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Refused to sign

/s/ Brad Shipley

Paul S. Padda, Esq.
Srilata Shah, Esq.
PAUL PADDA LAW, PLLC
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*Attorneys for Defendants Dionice S.
Juliano, M.D., Conrado Concio,
M.D And Vishal S. Shah, M.D.*

1 **CERTIFICATE OF SERVICE**

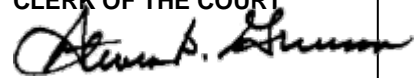
2 I hereby certify that on this 3rd day of December, 2021, a true and correct copy
3 of **DEFENDANT VALLEY HEALTH SYSTEM LLC'S VERIFIED MEMORANDUM OF**
4 **COSTS** was served by electronically filing with the Clerk of the Court using the Odyssey E-File &
5 Serve system and serving all parties with an email-address on record, who have agreed to receive
6 electronic service in this action.

7 Paul S. Padda, Esq.
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Attorneys for Defendants Dionice S. Juliano,
M.D., Conrado Concio, M.D And Vishal S.
Shah, M.D.

15
16
17 By /s/ Tiffany Dube
18 An Employee of
19 LEWIS BRISBOIS BISGAARD & SMITH LLP
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EXHIBIT H



1 S. BRENT VOGEL
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2 Brent.Vogel@lewisbrisbois.com
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*Attorneys for Defendant Valley Health System,
7 LLC dba Centennial Hills Hospital Medical
Center*

8
9 DISTRICT COURT
10 CLARK COUNTY, NEVADA
11

12 ESTATE OF REBECCA POWELL, through
BRIAN POWELL, as Special Administrator;
13 DARCI CREECY, individually and as Heir;
TARYN CREECY, individually and as an
14 Heir; ISALAH KHOSROF, individually and as
an Heir; LLOYD CREECY, individually,

15 Plaintiffs,

16 vs.

17 VALLEY HEALTH SYSTEM, LLC (doing
business as "Centennial Hills Hospital Medical
18 Center"), a foreign limited liability company;
UNIVERSAL HEALTH SERVICES, INC., a
19 foreign corporation; DR. DIONICE S.
JULIANO, M.D., an individual; DR.
20 CONRADO C.D. CONCIO, M.D., an
individual; DR. VISHAL S. SHAH, M.D., an
21 individual; DOES 1-10; and ROES A-Z;,
22

23 Defendants.

Case No. A-19-788787-C

Dept. No.: 30

NOTICE OF ENTRY OF ORDER

24 PLEASE TAKE NOTICE that the Order Regarding Plaintiffs' Motion to Extend Time to
25 Respond to Defendants' Valley Health Systems, Dr. Dionice S. Juliano, Dr. Conrado Concio, and
26 Dr. Fishal S. Shah's Memorandum of Costs was entered on January 24, 2022, a true and correct
27 copy of which is attached hereto.
28

DATED this 25th day of January, 2022

LEWIS BRISBOIS BISGAARD & SMITH LLP

By /s/ Adam Garth

S. BRENT VOGEL

Nevada Bar No. 6858

ADAM GARTH

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Attorneys for Attorneys for Defendant Valley

Health System, LLC dba Centennial Hills Hospital

Medical Center

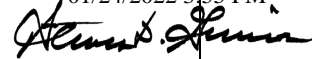
1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 25th day of January, 2022, a true and correct copy of **NOTICE OF**
3 **ENTRY OF ORDER** was served by electronically filing with the Clerk of the Court using the
4 Odyssey E-File & Serve system and serving all parties with an email-address on record, who have
5 agreed to receive electronic service in this action.

6 Paul S. Padda, Esq.
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Attorneys for Defendants Dionice S. Juliano,
M.D., Conrado Concio, M.D And Vishal S.
Shah, M.D.

14
15
16 By /s/ Heidi Brown
17 an Employee of
18 LEWIS BRISBOIS BISGAARD & SMITH LLP
19
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CLERK OF THE COURT

**DISTRICT COURT
CLARK COUNTY, NEVADA
-oOo-**

ESTATE OF REBECCA POWELL,)
Through BRIAN POWELL, as Special)
Administrator; DARCI CREECY,)
Individually and as an Heir; TARYN)
CREECY, individually and as an Heir;)
ISAIAH KHOSROF, individually and as)
An Heir; LLOYD CREECY, individually,)

Plaintiffs,)

vs.)

VALLEY HEALTH SYSTEM, LLC)
(doing business as "Centennial Hills)
Hospital Medical Center"), a Foreign)
Limited Liability Company;)
UNIVERSAL HEALTH SERVICES,)
INC., a Foreign Corporation; DR.)
DIONICE S. JULIANO, M.D., an)
Individual; DR. CONRADO C.D.)
CONCIO, M.D., an individual; DR.)
VISHAL S. SHAW, M.D., an individual;)
DOES 1-10; and ROES A-Z;)

Defendants.)

CASE NO.: A-19-788787-C
DEPT. NO.: XXX

**ORDER RE: PLAINTIFFS'
MOTION TO EXTEND TIME
TO RESPOND TO DEFENDANTS'
VALLEY HEALTH SYSTEMS,
DR. DIONICE S. JULIANO,
DR. CONRADO CONCIO, AND
DR. FISHAL S. SHAH'S
MEMORANDA OF COSTS**

INTRODUCTION

The above-referenced matter is scheduled for a hearing on January 26, 2022, with regard to the Plaintiffs' Motion to Extend Time to Respond to Defendants' Valley Health Systems, Dr. Dionice S. Juliano, Dr. Conrado Concio, and Dr. Fishal S. Shah's Memoranda of Costs. Pursuant to the Administrative Orders, this matter may be decided with or without oral argument. This Court has determined that it would be appropriate to decide this matter on the pleadings, and consequently, this Order issues.

FACTUAL AND PROCEDURAL HISTORY

On 11/19/21, the Court entered an Order Vacating Prior Order Denying Defendant Valley Health System, LLC DBA Centennial Hills Hospital Medical Center's Motion for Summary Judgment and Granting Said Defendant's Motion for Summary