Case Nos. 85525 & 85656

In the Supreme Court of Nevada

UNITED HEALTHCARE INSURANCE COMPANY; UNITED HEALTH CARE SERVICES, INC.; UMR, INC.; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC.; and HEALTH PLAN OF NEVADA, INC.,

Appellants,

vs.

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD.; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C.; and CRUM STEFANKO AND JONES, LTD.,

Respondents.

Case No. 85525

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UNITED HEALTHCARE INSURANCE COMPANY; UNITED HEALTH CARE SERVICES, INC.; UMR, INC.; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC.; and HEALTH PLAN OF NEVADA, INC.,

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT of the State of Nevada, in and for the County of Clark; and the Honorable NANCY L. ALLF, District Judge,

Respondents,

vs.

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD.; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C.; and CRUM STEFANKO AND JONES, LTD.,

Real Parties in Interest.

Case No. 85656

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458	Second Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits (Filed Under Seal)	01/05/22	126 127	31,309–31,393 31,394–31,500
231	Special Verdict Form	11/16/21	41	10,169–10,197
257	Special Verdict Form	11/29/21	49	12,035–12,046
265	Special Verdict Form	12/07/21	49	12,150–12,152
6	Summons – Health Plan of Nevada, Inc.	04/30/19	1	29–31
9	Summons – Oxford Health Plans, Inc.	05/06/19	1	38–41
8	Summons – Sierra Health and Life Insurance Company, Inc.	04/30/19	1	35–37
7	Summons – Sierra Health-Care Options, Inc.	04/30/19	1	32–34
3	Summons - UMR, Inc. dba United Medical Resources	04/25/19	1	20–22
4	Summons – United Health Care Services Inc. dba UnitedHealthcare	04/25/19	1	23–25
5	Summons – United Healthcare Insurance Company	04/25/19	1	26–28
433	Supplement to Defendants' Motion to Seal Certain Confidential Trial Exhibits (Filed	12/08/21	110 111	27,383–27,393 27,394–27,400

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170	Supplement to Defendants' Objection to Media Requests	10/31/21	29	7019–7039
439	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 1 of 18 (Filed Under Seal)	12/24/21	114	28,189–28,290
440	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 2 of 18 (Filed Under Seal)	12/24/21	114 115	28,291–28,393 28,394–28,484
441	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 3 of 18 (Filed Under Seal)	12/24/21	115 116	28,485–28,643 28,644–28,742
442	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 4 of 18 (Filed Under Seal)	12/24/21	116 117	28,743–28,893 28,894–28,938
443	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 5 of 18 (Filed Under Seal)	12/24/21	117	28,939–29,084
444	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 6 of 18 (Filed Under Seal)	12/24/21	117 118	29,085–29,143 29,144–29,219
445	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 7 of 18 (Filed Under Seal)	12/24/21	118	29,220–29,384
446	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 8 of 18 (Filed Under Seal)	12/24/21	118 119	29,385–29,393 29,394–29,527
447	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 9 of 18 (Filed Under Seal)	12/24/21	119 120	29,528–29,643 29,644–29,727
448	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial	12/24/21	120 121	29,728–29,893 29,894–29,907

Tab	Document	Date	Vol.	Pages
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449	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 11 of 18 (Filed Under Seal)	12/24/21	121	29,908–30,051
450	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 12 of 18 (Filed Under Seal)	12/24/21	121 122	30,052–30,143 30,144–30,297
451	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 13 of 18 (Filed Under Seal)	12/24/21	122 123	30,298–30,393 30,394–30,516
452	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 14 of 18 (Filed Under Seal)	12/24/21	123 124	30,517–30,643 30,644–30,677
453	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 15 of 18 (Filed Under Seal)	12/24/21	124	30,678–30,835
454	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 16 of 18 (Filed Under Seal)	12/24/21	124 125	30,836–30,893 30,894–30,952
455	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 17 of 18 (Filed Under Seal)	12/24/21	125	30,953–31,122
456	Supplemental Appendix of Exhibits to Motion to Seal Certain Confidential Trial Exhibits – Volume 18 of 18 (Filed Under	12/24/21	125 126	30,123–31,143 31,144–31,258

Tab	Document	Date	Vol.	Pages
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466	Transcript of Proceedings re Hearing Regarding Unsealing Record (Filed Under Seal)	10/05/22	129	31,923–31,943
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467	Transcript of Proceedings re Status Check (Filed Under Seal)	10/06/22	129	31,944–31,953
157	Transcript of Proceedings Re: Motions	10/19/21	22 23	5339–5500 5501–5561
160	Transcript of Proceedings Re: Motions	10/22/21	24 25	5908–6000 6001–6115
459	Transcript of Proceedings Re: Motions (Filed Under Seal)	01/12/22	127	31,501–31,596
460	Transcript of Proceedings Re: Motions (Filed Under Seal)	01/20/22	127 128	31,597–31,643 31,644–31,650
461	Transcript of Proceedings Re: Motions (Filed Under Seal)	01/27/22	128	31,651–31,661
146	Transcript of Proceedings Re: Motions (Via Blue Jeans)	10/06/21	21	5202–5234
290	Transcript of Proceedings Re: Motions Hearing	02/17/22	53	13,098–13,160
319	Transcript of Proceedings Re: Motions Hearing	04/07/22	68	16,837–16,855
323	Transcript of Proceedings Re: Motions Hearing	04/21/22	69	17,102–17,113
336	Transcript of Proceedings Re: Motions Hearing	06/29/22	71	17,610–17,681
463	Transcript of Proceedings Re: Motions Hearing (Filed Under Seal)	02/10/22	128	31,673–31,793

Tab	Document	Date	Vol.	Pages
464	Transcript of Proceedings Re: Motions Hearing (Filed Under Seal)	02/16/22	128	31,794–31,887
38	Transcript of Proceedings, All Pending Motions	06/05/20	6	1350–1384
39	Transcript of Proceedings, All Pending Motions	06/09/20	6	1385–1471
46	Transcript of Proceedings, Plaintiff's Motion to Compel Defendants' Production of Unredacted MultiPlan, Inc. Agreement	07/29/20	7	1644–1663
482	Transcript of Status Check (Filed Under Seal)	10/10/22	142	35,248–35,258
492	Transcript Re: Proposed Jury Instructions	11/21/21	146	36,086–36,250
425	Trial Brief Regarding Evidence and Argument Relating to Out-of-State Harms to Non-Parties (Filed Under Seal)	10/31/21	109	26,953–26,964
232	Trial Brief Regarding Jury Instructions on Formation of an Implied-In-Fact Contract	11/16/21	41	10,198–10,231
233	Trial Brief Regarding Jury Instructions on Unjust Enrichment	11/16/21	41	10,232–10,248
484	Trial Exhibit D5499 (Filed Under Seal)		142 143	35,264–35,393 35,394–35,445
362	Trial Exhibit D5502		76 77	18,856–19,000 19,001–19,143
485	Trial Exhibit D5506 (Filed Under Seal)		143	35,446
372	United's Motion to Compel Plaintiffs' Production of Documents About Which Plaintiffs' Witnesses Testified on Order Shortening Time (Filed Under Seal)	06/24/21	82	20,266–20,290
112	United's Reply in Support of Motion to Compel Plaintiffs' Production of Documents About Which Plaintiffs' Witnesses Testified	07/12/21	18	4326–4340

Tab	Document	Date	Vol.	Pages
	on Order Shortening Time			
258	Verdict(s) Submitted to Jury but Returned Unsigned	11/29/21	49	12,047–12,048

CERTIFICATE OF SERVICE

I certify that on April 18, 2023, I submitted the foregoing appendix for filing *via* the Court's eFlex electronic filing system.

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/s/ Jessie M. Helm
An Employee of Lewis Roca Rothgerber Christie LLP

vs.

UNITEDHEALTH GROUP, INC., a Delaware corporation; UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC., dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC., dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Jason S. McManis filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of counsel, Certificate of Good Standing from Texas and the State Bar of Nevada's Statement Pursuant to Supreme Court Rule 42(3)(b). The Motion was served on all appearing parties, and no objections were filed. Good cause appearing,

IT IS HEREBY ORDERED that the Motion is granted and Jason S. McManis is hereby admitted to practice in this Court for the purpose of this matter only.

DATED this 10 day of August, 2021.

Dated this 11th day of August, 2021

Nancy L Allf

DISTRICT COURT JUDGE TW

7AA A59 5FC0 07A9
Nancy Allf
District Court Judge

Respectfully submitted by:
McDONALD CARANO LLP

By: /s/ Pat Lundvall

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs,	Case No.: A-19-792978-B Dept. No.: XXVII **ORDER GRANTING MOTION TO ASSOCIATE COUNSEL MICHAEL KILLINGSWORTH ON ORDER SHORTENING TIME**

016755

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vs.

UNITEDHEALTH GROUP, INC., a Delaware corporation; UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC., dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC., dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Michael Killingsworth filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of counsel, Certificate of Good Standing from Texas and the State Bar of Nevada's Statement Pursuant to Supreme Court Rule 42(3)(b). The Motion was served on all appearing parties, and no objections were filed. Good cause appearing,

IT IS HEREBY ORDERED that the Motion is granted and Michael Killingsworth is hereby admitted to practice in this Court for the purpose of this matter only.

DATED this 10 day of August, 2021.

Dated this 11th day of August, 2021

Nancy L Allf

DISTRICT COURT JUDGE

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District Court Judge

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DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

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vs.

UNITEDHEALTH GROUP, INC., a Delaware corporation; UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC., dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC., dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Louis Liao filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of counsel, Certificate of Good Standing from Texas and the State Bar of Nevada's Statement Pursuant to Supreme Court Rule 42(3)(b). The Motion was served on all appearing parties, and no objections were filed. Good cause appearing,

IT IS HEREBY ORDERED that the Motion is granted and Louis Liao is hereby admitted to practice in this Court for the purpose of this matter only.

DATED this 10 day of August, 2021.

Dated this 11th day of August, 2021

Nancy L Allf

DISTRICT COURT JUDGE TW

C2A 7C6 78A1 772B
Nancy Allf
District Court Judge

Respectfully submitted by:
McDONALD CARANO LLP

By: /s/ Pat Lundvall

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs,	Case No.: A-19-792978-B Dept. No.: XXVII **ORDER GRANTING MOTION TO ASSOCIATE COUNSEL JANE L. ROBINSON ON ORDER SHORTENING TIME**

016765

016765

vs.

UNITEDHEALTH GROUP, INC., a Delaware corporation; UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC., dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC., dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Jane L. Robinson filed her Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of counsel, Certificate of Good Standing from Texas and California and the State Bar of Nevada's Statement Pursuant to Supreme Court Rule 42(3)(b). The Motion was served on all appearing parties and no objections were filed. Good cause appearing,

IT IS HEREBY ORDERED that the Motion is granted and Jane L. Robinson is hereby admitted to practice in this Court for the purpose of this matter only.

DATED this 30th day of August, 2021.

Dated this 30th day of August, 2021

Nancy L Allf

DISTRICT COURT JUDGE

TW

E68 342 3EF1 AC65
Nancy Allf
District Court Judge

Respectfully submitted by:
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By: /s/ Pat Lundvall

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DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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Attorneys for Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs,	Case No.: A-19-792978-B Dept. No.: XXVII **ORDER GRANTING MOTION TO ASSOCIATE COUNSEL PATRICK KEVIN LEYENDECKER ON ORDER SHORTENING TIME**

016770

016770

vs.

UNITEDHEALTH GROUP, INC., a Delaware corporation; UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC., dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC., dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Patrick Kevin Leyendecker filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of counsel, Certificate of Good Standing from Texas and the State Bar of Nevada's Statement Pursuant to Supreme Court Rule 42(3)(b). The Motion was served on all appearing parties, and no objections were filed. Good cause appearing,

IT IS HEREBY ORDERED that the Motion is granted and Patrick Kevin Leyendecker is hereby admitted to practice in this Court for the purpose of this matter only.

DATED this 30th day of August, 2021.

Dated this 30th day of August, 2021

Nancy L Allf

DISTRICT COURT JUDGE TW

EF9 09D 7BD6 7796
Nancy Allf
District Court Judge

Respectfully submitted by:
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DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

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EXHIBIT C

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EXHIBIT C

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Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs, vs. UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20, Defendants.	Case No.: A-19-792978-B Dept. No.: 27 **ORDER ADMITTING TO PRACTICE**

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Dimitri D. Portnoi, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificate of Good Standing" from the Supreme Court of California, said application having been noticed, there being no opposition to said application, the Court having considered this matter at a hearing on March 18, 2021, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Dimitri D. Portnoi, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 18 day of March, 2021.

Dated this 18th day of March, 2021

Nancy L Allf

DISTRICT COURT JUDGE

NB

32B 640 8711 D256
Nancy Allf
District Court Judge

Submitted by:

/s/ Colby L. Balkenbush

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DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

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CLERK OF THE COURT

ORD

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Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Case No.: A-19-792978-B
Dept. No.: 27

ORDER ADMITTING TO PRACTICE – JASON A. ORR

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Jason A. Orr, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificates of Good Standing" from the Supreme Court of Colorado and the Supreme Court of California, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Jason A. Orr, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 1 day of April, 2021.

Dated this 4th day of April, 2021

Nancy L Allf

DISTRICT COURT JUDGE

NB

488 210 89B9 33CF
Nancy Allf
District Court Judge

Submitted by:

/s/ Colby L. Balkenbush

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Attorneys for Defendants

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Case No.: A-19-792978-B
Dept. No.: 27

ORDER ADMITTING TO PRACTICE – ADAM G. LEVINE

Adam G. Levine, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificates of Good Standing" from the Supreme Court of California, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Adam G. Levine, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 1 day of April, 2021.
Dated this 4th day of April, 2021

Nancy L Allf

DISTRICT COURT JUDGE

NB

049 F01 DF46 B236
Nancy Allf
District Court Judge

Submitted by:

/s/ Colby L. Balkenbush

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Attorneys for Defendants

CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Case No.: A-19-792978-B
Dept. No.: 27

ORDER ADMITTING TO PRACTICE – HANNAH E. DUNHAM

Hannah E. Dunham, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificates of Good Standing" from the Supreme Court of California, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Hannah E. Dunham, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 1 day of April, 2021.

Dated this 4th day of April, 2021

Nancy L Allf

DISTRICT COURT JUDGE

NB

35B E83 9F84 191C
Nancy Allf
District Court Judge

Submitted by:

/s/ Colby L. Balkenbush

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

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Hannah Dunham, Esq. *(Admitted Pro Hac Vice)*
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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs, vs. UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20, Defendants.	Case No.: A-19-792978-B Dept. No.: 27 **ORDER ADMITTING TO PRACTICE – NADIA LAURA FARJOOD, ESQ.**

Nadia Laura Farjood, Esq., having filed her Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificate of Good Standing" from the Supreme Court of California, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Nadia Laura Farjood, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 25 day of June, 2021.

~~Dated this 30th day of June, 2021~~

Nancy L Allf

DISTRICT COURT JUDGE

TW

D1A 8A8 9CA2 287C
Nancy Allf
District Court Judge

Submitted by:

/s/ Brittany M. Llewellyn

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs, vs. UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20, Defendants.	Case No.: A-19-792978-B Dept. No.: 27 **ORDER ADMITTING TO PRACTICE**

K. Lee Blalack, II, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificate of Good Standing" from the District of Columbia Court of Appeals, Supreme Court of Tennessee, and Court of Appeals of Maryland, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and K. Lee Blalack, II, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this ____ day of December, 2020.

Dated this 29th day of December, 2020

Nancy L Allf

DISTRICT COURT JUDGE

4D8 5EC 838A B7AC
Nancy Allf
District Court Judge

Submitted by:

/s/ Colby L. Balkenbush

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Attorneys for Defendants

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Case No.: A-19-792978-B
Dept. No.: 27

ORDER ADMITTING TO PRACTICE – JEFFREY E. GORDON

Jeffrey E. Gordon, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificates of Good Standing" from the Court of Appeals of Maryland and District of Columbia Court of Appeals, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Jeffrey E. Gordon, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 1 day of April, 2021.

Dated this 4th day of April, 2021

Nancy L Allf

DISTRICT COURT JUDGE

NB

60A 2B2 632A 66D2
Nancy Allf
District Court Judge

Submitted by:

/s/ Colby L. Balkenbush

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs, vs. UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20, Defendants.	Case No.: A-19-792978-B Dept. No.: 27 **ORDER ADMITTING TO PRACTICE – KEVIN D. FEDER**

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Kevin D. Feder, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificates of Good Standing" from the District of Columbia Court of Appeals and the Supreme Court of California, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Kevin D. Feder, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 7 day of June, 2021.

Dated this 7th day of June, 2021

Nancy L Allf

DISTRICT COURT JUDGE

TW

EC8 3FA DBE2 0C42
Nancy Allf
District Court Judge

Submitted by:

/s/ Colby L. Balkenbush

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Attorneys for Defendants

CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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DISTRICT COURT
CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs, vs.	Case No.: A-19-792978-B Dept. No.: 27 **ORDER ADMITTING TO PRACTICE - JASON YAN, ESQ.**

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UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Jason Yan, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificate of Good Standing" from the Virginia State Bar and the District of Columbia Court of Appeals, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Jason Yan, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 9th day of September, 2021.
Dated this 10th day of September, 2021

Nancy L Allf
DISTRICT COURT JUDGE

TW

AD9 0D6 6B00 9FA0
Nancy Allf
District Court Judge

Submitted by:

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CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

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Attorneys for Defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Case No.: A-19-792978-B
Dept. No.: 27

ORDER ADMITTING TO PRACTICE – PAUL J. WOOTEN

Paul J. Wooten, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificates of Good Standing" from the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Paul J. Wooten, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 1 day of April, 2021.

Dated this 4th day of April, 2021

Nancy L Allf

DISTRICT COURT JUDGE

NB

D99 E35 D2FA 1917
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District Court Judge

Submitted by:

/s/ Colby L. Balkenbush

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DISTRICT COURT
CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs, vs. UNITEDHEALTH GROUP, INC., UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC. dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC. dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20, Defendants.	Case No.: A-19-792978-B Dept. No.: 27 **ORDER ADMITTING TO PRACTICE – PHILIP E. LEGENDY**

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Philip E. Legendy, Esq., having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Petition for Permission to Practice in this Case Only by Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel, "Certificates of Good Standing" from the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department and the Supreme Court of New Jersey, said application having been noticed, there being no opposition to said application, the Court having considered this matter, the Court being fully apprised in the premises, and good cause appearing, it is hereby:

ORDERED, that said application is granted and Philip E. Legendy, Esq. is hereby admitted to practice in the above-entitled Court for the purposes for the above-entitled matter.

DATED this 2 day of May, 2021.

Dated this 20th day of May, 2021

Nancy L Allf

DISTRICT COURT JUDGE

NB

FEA C6A 9789 66AF
Nancy Allf
District Court Judge

Submitted by:

/s/ Colby L. Balkenbush

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CLARK COUNTY, NEVADA

Fremont Emergency Services (Mandavia) Ltd, Plaintiff(s) vs. United Healthcare Insurance Company, Defendant(s)	CASE NO: A-19-792978-B DEPT. NO. Department 27

AUTOMATED CERTIFICATE OF SERVICE

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Fremont Emergency Services (Mandavia), Ltd.; Team Physicians of Nevada-Mandavia, P.C.; Crum, Stefanko and Jones, Ltd. dba Ruby Crest Emergency Medicine (collectively the "Health Care Providers") submit this response in opposition to Defendants' motion for a stay of execution of judgment without security. This opposition is based upon the record in this matter, the points and authorities that follow, the pleadings and papers on file in this action, and any argument of counsel entertained by the Court.

POINTS AND AUTHORITIES

I. DEFENDANTS SHOULD NOT BE HEARD ON ANY REQUEST FOR A STAY UNDER NRCP 62(d) AT THIS TIME.

Defendants have failed to provide proper notice to the Court or Plaintiffs regarding the relief they seek. Defendants' motion is titled a "Rule 62(b) Motion for Stay" and their memorandum of points and authorities focuses on the requirements of a motion under NRCP 62(b) to obtain a stay pending the resolution of post-judgment motions. *See* Defendants' Motion at 1, 5, and 8; NRCP 62(b). The motion itself, however, states that the Defendants are requesting "a stay of execution pending resolution of Defendants' post-judgment motions (NRCP 62(b)) **and appeal** (NRCP 62(d))." Defendants' Motion at 2 (emphasis added).

Defendants' request is as untimely as it is unclear. Defendants have been aware of the rules governing the automatic stay and the likelihood of post-judgment motions since before this Court entered judgment a month ago. Yet despite knowing the applicable deadlines, Defendants waited until three days before the automatic stay was set to expire to file their motion and request an order shortening time, deliberately limiting Plaintiffs' opportunity to prepare a fulsome response. Defendants have provided no explanation for their delay.

A stay pending appeal is a significant request, materially different from a stay lasting only through the end of post-judgment motions. To the extent Defendants urge the Court to address their request to stay execution of judgment **pending appeal** under NRCP 62(d), Plaintiffs request that the Court set a hearing on that request at a future date to allow Plaintiffs adequate time to brief and argue the very different issues involved.

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II. DEFENDANTS HAVE NOT PROVIDED ADEQUATE SECURITY EVEN FOR A STAY LIMITED TO NRCP 62(b).

NRCP 62(b) provides that a court may stay execution on a judgment pending disposition of post-judgment motions on "appropriate terms for the opposing party's security." United has failed to meet this standard. After its many weeks of preparation to file this motion, United has offered information on the financial condition of only one defendant, United HealthCare Services, representing 23% of the judgment.

While United's affiant blithely asserts that United HealthCare Services has the "ability to pay the judgment entered against it **and its affiliates in this case**," United has provided no guarantee that United HealthCare Services actually **would** pay the judgment debt of its affiliates in this case. Even assuming that a defendant's financial condition is sufficient grounds to justify waiving security for **that defendant**, without an enforceable undertaking that United HealthCare Services will assume responsibility for the entire judgment Plaintiffs are left without any security at all for $48,765,332.85, or 77% of the judgment. This does not come close to meeting the standard of NRCP 62(b).

Plaintiffs' concerns are not merely hypothetical. This entire lawsuit arises from Defendants' persistent and deliberate refusal to pay Plaintiffs fairly for services rendered, a refusal that the jury found to be the result of malice, oppression, and fraud. And in fact, since the verdict, United has doubled down on its retaliatory attacks on Plaintiffs and their affiliates, including:

- **Reducing reimbursement rates in Nevada** since the jury's verdict;
- **Attacking the jury's verdict** in this case as a cause of high healthcare costs through multiple media outlets;
- **Strangling reimbursement requests** by requesting excessive numbers of medical records and other documents in order to hamper reimbursement; and

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- **Refusing to pay** certain types of emergency-medical claims and requiring resubmission of the claims without justification.[1]

Defendants' approach to this motion underscores their lack of seriousness about this verdict and their obligation to pay the judgment. After waiting weeks—without explanation—before filing a motion that does not even coherently describe the relief they seek, Defendants only bothered to support their claim with a single affidavit covering only one of five defendants. Defendants are here because they persistently refuse to pay the Plaintiffs. They should be required to post a bond.

III. CONCLUSION

Because Defendants have not provided adequate security under NRCP 62(b), Plaintiffs respectfully request this Court to deny their motion. If the Court is inclined to grant a motion under NRCP 62(b) on the basis of United HealthCare Services' ability to pay, Plaintiffs request that either only that portion of the judgment be superseded, or that United HealthCare Services be required to provide an enforceable undertaking to pay the **entire** amount of the judgment in this case. Finally, this Court should not entertain any request by Defendants for relief under NRCP 62(d) at this time.

DATED this 7th day of April, 2022.

AHMAD ZAVITSANOS & MENSING P.C.

By: */s/ Jane Langdell Robinson*

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[1] Because of the short notice due to Defendants' delay, Plaintiffs do not have adequate time to prepare appendices demonstrating these harms, but can do so as needed with additional time.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Ahmad Zavitsanos & Mensing PC, and on this 7th day of April, 2022, I caused a true and correct copy of the foregoing **PLAINTIFFS' OPPOSITION TO DEFENDANTS' RULE 62(b) MOTION FOR STAY** to be served via this Court's Electronic Filing system in the above-captioned case, upon the following:

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Plaintiffs,

vs.

Case No.: A-19-792978-B
Dept. No.: 27

REPLY ON "DEFENDANTS' RULE 62(b) MOTION FOR STAY PENDING RESOLUTION OF POST-TRIAL MOTIONS"
(on Order Shortening Time)

Hearing Date: April 7, 2022
Hearing Time: 1:30 p.m.

UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC., dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC., dba UNITED MEDICAL RESOURCES, a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation,

Defendants.

Plaintiffs appear to have misunderstood the scope of the Rule 62(b) motion and the security offered. To alleviate plaintiffs' concerns, this reply dispels those misconceptions.

1. This Motion Is Only for the Rule 62(b) Stay Pending Post-Judgment Motions, Not the Rule 62(d) Stay Pending Appeal

Defendants apologize for any lack of clarity caused by the reference to Rule 62(d) in the introduction. This is not a motion for stay pending appeal. As emphasized elsewhere in the brief (Mot. 1:24, 3:14-15, 8:19-21), the sole relief defendants seek today is a stay pending the resolution of post-judgment motions under NRCP 62(b). This kind of stay is typically granted as a matter of professional courtesy and does not impact the question of whether defendants would need to post a *supersedeas* bond under NRS 20.037(1) and NRCP 62(d) to secure the judgment pending appeal.

2. The Financials Reported Are those of All UHS Subsidiaries, Including Defendants Here; UHS Is Guaranteeing the Entire Judgment

Plaintiffs also misunderstand the nature of the guarantee from defendant United HealthCare Services, Inc. (UHS). The financials reported include those of the remaining defendants as UHS's direct or indirect subsidiaries. (Ex. A to Daniel Kueter Decl.) And to be clear: UHS will guarantee the judgment on behalf of all defendants. This guarantee is more than adequate security for a Rule 62(b) stay.

As these clarifications alleviate the concerns identified by plaintiffs, defendants respectfully ask this Court to grant the motion for a limited Rule 62(b) stay pending the resolution of post-judgment motions.

Dated this 7th day of April, 2022.

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I hereby certify that on the 7th day of April, 2022, a true and correct copy of the foregoing "Reply on "Defendants' Rule 62(b) Motion For Stay Pending Resolution of Post-Trial Motions" *(on Order Shortening Time)*" was electronically filed/served on counsel through the Court's electronic service system pursuant to Administrative Order 14-2 and N.E.F.C.R. 9, via the electronic mail addresses noted below, unless service by another method is stated or noted:

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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA) LTD.,	)	CASE NO: A-19-792978-B
Plaintiff(s),	)	
vs.	)	DEPT. XXVII
UNITED HEALTHCARE INSURANCE COMPANY,	)	
Defendant(s).	)	

BEFORE THE HONORABLE NANCY ALLF, DISTRICT COURT JUDGE

THURSDAY, APRIL 7, 2022

TRANSCRIPT OF PROCEEDINGS

RE: MOTIONS HEARING

SEE PAGE 2 FOR APPEARANCES

SEE PAGE 3 FOR MATTERS

RECORDED BY: VELVET WOOD, COURT RECORDER
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1 **LAS VEGAS, CLARK COUNTY, NEVADA**

2 **THURSDAY, April 7, 2022 1:30 p.m.**

3 * * * * *

4 THE COURT: Let me take the case of Fremont versus
5 United.
6 Let's take appearances from plaintiffs first, please.
7 MS. GALLAGHER: Good afternoon, Your Honor. Kristin
8 Gallagher, on behalf of the plaintiff Health Care Providers.
9 THE COURT: You finally got to talk in this case.
10 MS. GALLAGHER: It has been a little bit.
11 THE COURT: Okay.
12 MS. GALLAGHER: And without a mask, and without being
13 remote. It is a pleasure to see you in person, Your Honor.
14 THE COURT: Same.
15 MS. GALLAGHER: Thank you.
16 MS. ROBINSON: Good afternoon, Your Honor. Jane
17 Robinson, here for the Health Care Providers as well.
18 THE COURT: Thank you.
19 MR. SMITH: Good morning, Your Honor. And I am sure
20 you are sick of hearing me talk.
21 THE COURT: Never.
22 MR. SMITH: Abe Smith, Dan Polsenberg, and Dimitri
23 Portnoi, for defendants.
24 THE COURT: Very good. Thank you all.
25 All right. So this is the defendant's motion.

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1 Who is your spokesperson?
2 MR. SMITH: I will be arguing.
3 So I don't know if Your Honor had a chance to review
4 the very short reply.
5 THE COURT: I have read everything. But I did it in
6 the last 15 minutes --
7 MR. SMITH: Okay.
8 THE COURT: -- because I had a CLE from 12:00 to 1:00.
9 MR. SMITH: Very good, Your Honor.
10 Thank you for your speed reading on our behalf.
11 So just a couple of points of clarification. This is
12 just the Rule 62(b) stay we are talking about. I understand
13 for a stay pending appeal, we would want, you know, more
14 fulsome briefing and all of that.
15 THE COURT: Of course.
16 MR. SMITH: And you know, obviously that's a bigger
17 deal for a longer time and all of that.
18 So all we are talking about is stay pending the
19 resolution of our post-judgment motions.
20 Now, as Your Honor knows, in our jurisdiction, it's
21 common courtesy, professional practice to just -- for the
22 parties to agree on such a stay. At least that has been our
23 experience in the endoscopy cases where there was a
24 $425 million verdict, Eglet's office gave our -- gave actually
25 United Healthcare a stay without bond, pending the resolution

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1 of post-judgment motions. Again, stay pending appeals --
2 pending appeal is a different thing.
3 We had a case, Dan and I, where we were on the
4 plaintiff's side, and we had gotten a judgment for about 50
5 million. The same thing. You know, we gave the other side a
6 stay pending post-judgment motions. So that's just how it
7 normally works.
8 I understand in this case that the plaintiffs, they
9 are not required to, you know, give us a stay. That is why
10 Rule 62(b) exists.
11 But in this circumstance, the judgment is very secure.
12 We have presented the evidence of the financial condition, not
13 just of United Healthcare Services, but also all of its
14 subsidiaries. Obviously, those roll up into United Healthcare
15 Services. And yes, we are saying that United Healthcare
16 Services would guarantee the judgment, the entire judgment on
17 behalf of all of the defendants. So the judgment is entirely
18 secure.
19 In fact, the security that we're offering is better
20 than the security they would get from a supersedeas bond
21 because under NRS 20.0371, the legislature, I think back in
22 2015, enacted a statute saying that no supersedeas bond would
23 have to be given over $50 million.
24 So in this case, the judgment currently is above 50
25 million, but the supersedeas bond we could get an automatic

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1 stay just by posting the 50 million. So we are actually
2 offering something that is more secure than the supersedeas
3 bond itself.
4 THE COURT: Tell me more about the guarantee, because
5 I had to speed read. And I didn't give you guys much chance
6 to respond.
7 So if you have time considerations, raise that in your
8 opposition.
9 So tell me more about this.
10 MR. SMITH: So the concern seemed to be that in our --
11 the declaration from -- for Mr. Kueter, he had said that I
12 have personal knowledge of UHS' financial position, including
13 its ability to pay the judgment entered against it and its
14 affiliates in this case.
15 And we are just making clear that that ability to pay
16 is -- it's not just we are saying that they have the resources
17 but we would actually withhold payment. No. It would
18 actually be a guarantee to pay the judgment. I mean, in this
19 case, there is going to be an appeal. So practically
20 speaking, we are talking about if the judgment were affirmed
21 on appeal.
22 But for purposes of the 50 -- of the 62(b) stay, you
23 know, pending the post-judgment motions.
24 THE COURT: Well, and what if he doesn't have
25 authority to make that representation?

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1 MR. SMITH: So -- okay. And this was -- this was
2 another point of clarification. As I understand it -- and I
3 did look through some of the org charts -- each of the
4 defendants is a subsidiary, whether it is direct or indirect,
5 of United Healthcare Services. So they all roll up into
6 United Healthcare Services. So yes, United Healthcare
7 Services has the authority to direct payment of the entire
8 judgment.
9 THE COURT: But what if the board of directors decides
10 that he didn't have authority? May I --
11 MR. SMITH: Are you talking about to make the
12 declaration?
13 THE COURT: Yeah.
14 MR. SMITH: I guess that would be an issue that the --
15 I mean, I suppose -- we are talking about representations not
16 only from a company officer but as officers of the court.
17 THE COURT: I'm not concerned about you.
18 MR. SMITH: I expect there are probably some kind of
19 contempt proceedings --
20 THE COURT: I'm not concerned about you.
21 MR. SMITH: -- if it were misrepresentation.
22 But I mean in terms of the collectability of the
23 judgment, I feel like the guarantee that we would offer is
24 strong in the way that a supersedeas bond is strong. The
25 difference of course, is that, you know, with the supersedeas

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1 bond, you are limited to the 50 million.
2 So I am not sure I understood or answered your
3 question.
4 But I don't foresee a scenario where the board of
5 directors would rescind the authority that Mr. Kueter already
6 demonstrated in the declaration we attached.
7 THE COURT: And when does your stay end?
8 MR. SMITH: So for now, we would just be asking for a
9 stay pending -- I suppose it would be from the notice of entry
10 of judgment.
11 THE COURT: No. You have an automatic stay now. And
12 its --
13 MR. SMITH: Oh, the current stay.
14 THE COURT: It expires Monday?
15 MR. SMITH: That would be my reading of the statute.
16 So it would be through Friday, which means the first
17 opportunity to essentially execute would be the business day
18 after that, which would be Monday.
19 THE COURT: Good enough. I asked you a lot of
20 questions.
21 Did you get to make your case?
22 MR. SMITH: Yes, Your Honor. Thank you.
23 THE COURT: Thank you.
24 And who is the spokesperson for the plaintiffs?
25 MS. ROBINSON: I will, Your Honor.

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1 THE COURT: Go ahead, Ms. Robinson.
2 MS. ROBINSON: Can you hear me okay? I hear a slight
3 echo. I just want to make sure everything is okay on your
4 end.
5 THE COURT: We have -- our court recorder is typing,
6 but she has to.
7 So go ahead, please.
8 MS. ROBINSON: And the camera is not turned on you,
9 Your Honor. So I apologize. I can't respond to your -- your
10 nonverbal cues. So I will just listen very carefully for the
11 verbal cues.
12 THE COURT: You know, we did a seminar --
13 MS. ROBINSON: Oh, there you are.
14 THE COURT: -- over the noon hour in the courtroom.
15 It should be voice-activated. You should be able to see me.
16 And when I am looking away --
17 MS. ROBINSON: Now I can see you.
18 THE COURT: -- it is because I have a closer screen
19 here. So it doesn't mean I am ignoring you.
20 MS. ROBINSON: Not at all. The screen -- this is the
21 first time it has changed views. And so I was afraid -- when
22 you were speaking before, it wasn't switching back. So I just
23 wanted to make sure.
24 So just to respond on behalf of the Health Care
25 Providers, we were very glad to hear, of course, that this

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1 request was limited to just the post-judgment period and not
2 through the entire appeal, as we expressed in our brief.
3 I do have concern about -- about one defendant
4 guaranteeing payment of the entire judgment. The point of a
5 corporate forum, obviously, is that just because a subsidiary
6 are subsidiaries of UHS, doesn't mean that one of those
7 subsidiaries couldn't go bankrupt, which, you know -- and
8 that's the point of having subsidiaries that are their own
9 separate entities. Without, you know, an alter ego finding, I
10 don't think that we would automatically be able to assume that
11 we would be entitled to collect the entire judgment from the
12 parent corporation. And so that is a significant and real
13 concern.
14 And I agree that, you know, when we are talking about
15 a very, very large amount of money, I don't -- while I
16 appreciate and respect the representations of the lawyers and
17 I understand and believe they were made in good faith, that is
18 not necessarily something that I could enforce. I don't feel
19 comfortable that that is something that I can necessarily
20 enforce. So that is just a concern that we have.
21 The purpose of supersedeas is -- it's twofold. It's a
22 give and take. The judgment debtor gets a significant
23 benefit, because it delays the obvious burden of having to
24 satisfy judgment. But they are supposed to go both ways.
25 There is supposed to be a benefit to the judgment creditor as

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1 well, and that is that you have a bond, or some sort of
2 security, where if the judgment is affirmed, that judgment
3 creditor no longer has to go through as much work to collect
4 the judgment. It has not only just a guarantee, but it's just
5 simply a much simpler task to collect that judgment.
6 And I think it in fairness to my clients, this entire
7 lawsuit is about the fact that my clients have debts, that
8 they are a creditor, and United has persistently refused to
9 pay them. And that, in fact, the jury found has done that
10 deliberately and with malice.
11 And so, you know, I think that my client has genuine
12 real concerns about just a representation from United
13 Healthcare that we have plenty of money, and therefore that
14 should be all the representation that you need.
15 And I think there is an inherent tension in the
16 argument that we have so much money, we have so much money
17 that we should be relieved of the inconvenience of events of
18 providing supersedeas.
19 So I understand that we are just talking about a
20 relatively short period of time here. And so, you know, as I
21 say, you know, nonetheless, we have a lot of concerns about
22 the fact that we really only had evidence from one of the five
23 defendants.
24 But I think if the Court is inclined to grant
25 temporary relief, it is really important that we set a firm

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1 deadline for when that relief will end, so that United knows
2 that it can go ahead and start making its preparations now.
3 It waited until three days before expiration of the bond to
4 file its motion for relief and to ask the Court to shorten
5 time so that it wouldn't have to make an emergency motion to
6 the Nevada Supreme Court.
7 And from our perspective, no emergency -- there was no
8 emergency because this has been known. United -- all the
9 parties have known that this deadline would come. And there
10 was absolutely no reason to wait as long as United did. And I
11 would, you know, prefer to have a set expectation, so that we
12 aren't in the situation again, because nobody wants to go on
13 some kind of emergency basis to the Nevada Supreme Court.
14 So I think it is important that any relief be set with
15 a date certain. For instance, it would expire, for instance,
16 on May 11th when I believe our post-judgment motions will be
17 heard, so that United has ample time to make its preparations
18 to file any motion that it wants to file. And therefore we
19 can take care of this in a timely manner, without a scramble
20 or an emergency.
21 So finally, you know, yes, supersedeas is
22 inconvenient, but it is there for a reason. There should be a
23 give and a take. It shouldn't all be benefit on one side. It
24 is there so that not only is the judgment secure and it
25 provides some relief to the judgment debtor, but it should

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1 also make it easier for the judgment creditor to collect.
2 So, you know, certainly going forward, we would like
3 to review the fact that we would not be satisfied with a
4 simple representation by United Healthcare that we shouldn't
5 worry because they have so much money.
6 So unless the Court has any further questions,
7 that's our response.
8 THE COURT: I don't. Thank you.
9 And the reply, please?
10 MR. SMITH: Thank you, Your Honor.
11 And I respect Ms. Robinson. But I think that there
12 has been a misunderstanding of the factors that govern this
13 Court's inquiry.
14 THE COURT: She didn't have very long to put an
15 opposition together.
16 MR. SMITH: Fair enough.
17 But in *Nelson versus Heer*, the Supreme Court laid out
18 the *Dillon* factors that govern when -- and that's actually
19 talking about a stay pending appeal, so that would be the full
20 62(d) stay.
21 But even in that context, it's clear that there is
22 not a contradiction in saying that, you know, because a
23 defendant has substantial financial resources, that that might
24 be a reason to waive a bond requirement. In fact, that is one
25 of the factors -- two of the factors under the *Dillon* test.

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1 Obviously, it's not always going to be the case that a
2 defendant is -- receives a waiver of the bond because they are
3 in a precarious financial position. In fact, it is more
4 likely that the waiver would be granted on the opposite end,
5 when the stay is secure because of the financial solvency of
6 the judgment debtor.
7 I have to say, if United is not able to obtain a stay
8 under those circumstances, I don't see how any defendant -- I
9 don't see any circumstance where the *Dillon* factors could be
10 satisfied, if we are setting the bar that high, where a
11 corporation of this size is not able to obtain a stay of a
12 judgment that even right now is just north of 60 million.
13 The other thing I have to say is part of the reason
14 why --
15 THE COURT: Just north of 60?
16 MR. SMITH: If I did my calculation correctly.
17 THE COURT: I think it is 75 or 76 million. That's
18 what I --
19 MR. SMITH: Okay.
20 THE COURT: -- recall.
21 MR. SMITH: I will take your word for it. That may be
22 right.
23 But in any event, we are also still talking about the
24 post-judgment phase -- the post-judgment motions where this --
25 Your Honor has not even looked at the issue of the

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1 constitutional requirements of the -- for punitive damages.
2 I mean, there really is very little question that a
3 punitive damages award 14,000 times a compensatory damages
4 award would need to be remitted to some extent. So I don't
5 think we are going to be going up on appeal on the same
6 judgment that we have now.
7 But regardless, we have talked -- Ms. Robinson talked
8 about the needing a date certain.
9 The only problem I have with that is that we need to
10 know what the judgment is going to look like for the
11 post-judgment motions before we -- you know, if we are not
12 going to be able to obtain a waiver --
13 I understand we are separately going to brief the
14 question of getting a 62(d) stay. But my concern would be if
15 we are just going to set that date on the date that the
16 hearings are set, we won't have the time to process that
17 information. That's why I suggest, you know, from the notice
18 of entry of the actual orders, denying or partially denying
19 the post-judgment relief, so that we could actually know what
20 this judgment is going to look like that we would need to
21 secure.
22 THE COURT: We do have a judgment entered at this
23 point.
24 MR. SMITH: Right. But I mean, the whole point --
25 THE COURT: But I know it is subject to amendment.

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1 MR. SMITH: The whole point of the 62(b) stay, though,
2 would be to allow the parties -- I mean, if we were just
3 talking about a stay through a date certain, rather than a
4 62(b) stay, then that doesn't really get us the -- you know,
5 the information that we would need to take account.
6 I mean, the whole point is you get the whole
7 resolution of the point judgment -- the post-judgment motions.
8 And then at that point, then you can secure your supersedeas
9 bond, or stay pending appeal without bond, with the knowledge
10 of what the outcome is going to be.
11 So I think it would be difficult to have this stay end
12 right on the day of the hearing, when that would perhaps be
13 the first time that we would know for certain what the
14 character of this stay we would need to seek under 62(d) would
15 look like.
16 So does that make sense?
17 THE COURT: Makes sense.
18 MR. SMITH: Okay.
19 THE COURT: It does.
20 Okay. Matter is submitted.
21 This is the defendant's request for a stay -- to
22 extend the automatic stay under the Civil Rules after entry of
23 the judgment.
24 And I am somewhat troubled by the fact that it came so
25 late in the process. And I felt compelled to set it at a time

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1 where I knew the plaintiff wouldn't be able to fully have the
2 chance to oppose it.
3 But I'm willing to give the defendant a stay through
4 the resolution of the post-trial motions on this condition:
5 They can either get a board resolution and a written personal
6 guarantee or they can post the bonds. And they'll have until
7 the end of the resolution of the -- and that decision has to
8 be made by April 29, 2022.
9 And if that is done, the stay will be extended through
10 the resolution of the post-trial motions.
11 MS. ROBINSON: Thank you, Your Honor.
12 THE COURT: So that will be the choice of the
13 defendant.
14 MR. SMITH: Thank you, Your Honor.
15 So as I understand it then we would need to file a
16 notice of the board resolution with the Court on or before
17 April 29?
18 THE COURT: And if you need to seal that, of course --
19 MR. SMITH: Okay.
20 THE COURT: -- just go through the sealing provisions.
21 MR. SMITH: Okay.
22 THE COURT: But they have to make the election by
23 April 29th.
24 MR. SMITH: Very good.
25 THE COURT: All right.

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1 [Proceeding concluded at 1:47 p.m.]

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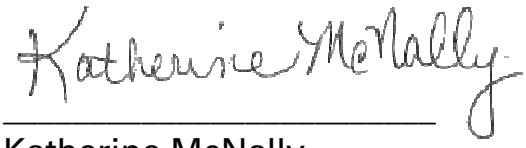
ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video proceedings in the above-entitled case to the best of my ability.



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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs, vs. UNITEDHEALTH GROUP, INC., a Delaware corporation; UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC., dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC., dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation;	Case No.: A-19-792978-B Dept. No.: XXVII **OPPOSITION TO DEFENDANTS' MOTION TO RETAX COSTS** Date of Hearing: 5/11/22 Time of Hearing: 9:30 a.m.

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SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Defendants do not challenge (1) the timeliness of Plaintiffs' Verified Memorandum of Costs; (2) the requested costs were actually incurred and paid by Plaintiffs; (3) the requested costs are substantiated by back-up documentation; (4) the categories of requested costs are authorized categories of costs pursuant to NRS 18.005; or (5) Plaintiffs are prevailing parties entitled to recovery of costs pursuant to NRS 18.020(3). Instead, Defendants simply challenge Plaintiffs' proof of either reasonableness or necessity of six sub-categories from Plaintiffs' Verified Memorandum of Costs. With the exception of two sub-categories, Defendants are simply wrong in questioning their reasonableness or necessity. As to two sub-categories, certain of Defendants' contentions are well-taken and therefore Plaintiffs revise their request downward from $1,093,530.73 to $1,081,101.84. Each of the six contested sub-categories is addressed in turn below. The challenged invoices for all six sub-categories are attached hereto for the Court's convenience in reviewing Defendants' limited challenge.

I. THE EXPERT WITNESS FEES INCURRED WERE BOTH REASONABLE AND NECESSARY.

Attached at tab A are the invoices from Plaintiffs' testifying expert (David Leathers), who works with the firm Alvarez & Marsal. Defendants complain that portions of those invoices were redacted. The portions redacted were to obscure the bank account and wiring instruction information for payment of Alvarez & Marsal's invoices. Counsel for Plaintiffs will bring unredacted versions of those pages to the hearing on Defendants' motion so either the Court or Defendants' counsel can verify the undersigned's representation. A review of the invoices found at tab A and the Verified Memorandum of Costs reveals Plaintiffs' submission covers all the factors suggested by the Nevada Court of Appeals in *Frazier v. Drake*, 131 Nev. 632, 650-51, 357 P.3d 377-78 (Nev. App. 2015).

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David Leathers and his team at Alvarez & Marsal provided critical expert reports and expert testimony about the reasonableness of the requested damages sought by Plaintiffs. While the experts proffered by Defendants to the jury tried to make that issue difficult or complex, Mr. Leathers sought to make the basic concept of the reasonableness of Plaintiffs' charges submitted for payment to Defendants simple and understandable. At the same time, Mr. Leathers and his team sought to explain, and assist in revealing the fact that Defendants' actual payments to Plaintiffs were unreasonably low and unusual or out-of-the-ordinary. From the result obtained, it is clear Mr. Leathers and his team did a good job with their tasks. The expert information provided by Mr. Leathers could not have been repetitive since he was the only expert witness proffered by Plaintiffs. Moreover, to the extent Mr. Leathers offered testimony on topics Mr. Phillips had previously addressed in his prior reports, Mr. Leathers necessarily fulfilled his independent professional obligation to perform his own analysis to develop and substantiate his own opinions and conclusions. The independent investigation and testing conducted by Mr. Leathers and his team is reflected at tab A, along with the time entries for each task performed. At trial, Mr. Leathers fully described his education, training, standard fees, and the total amount of fees charged to Plaintiffs, while also comparing those to others in his field and this case. Simply put, the jury could not have fully understood or appreciated the damage estimates offered by Plaintiffs, as compared to those offered by Defendants, without the expert testimony of Mr. Leathers. Plaintiffs have affirmatively demonstrated all factors suggested by the court in *Frazier v. Drake* to demonstrate both the reasonableness of his fees and the necessity therefore.

II. WITH THE EXCEPTION OF 4 FIRST CLASS TICKETS, PLAINTIFFS' REQUESTED COSTS FOR TRAVEL AND LODGING WERE BOTH REASONABLE AND NECESSARY.

Both Plaintiffs and Defendants employed out-of-state counsel to assist with trial presentation in this case. Both stayed in local hotels and incurred air travel expenses. Clearly both sides believed the travel and lodging of out-of-state attorneys were necessary to assist the jury in understanding the cutting edge issues at stake in this case. Plaintiffs

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seek reimbursement of these travel expenses under both NRS 18.005(15) (travel and lodging costs incurred taking depositions and conducting discovery) and NRS 18.05(17) (any other reasonable and necessary expense incurred in connection with the action).

As to the comparable reasonableness of those fees, out-of-state counsel for Defendants chose to stay at the J.W. Marriott in Summerlin. The rates for that hotel are similar, and occasionally in fact exceed, the rates charged for Plaintiffs' counsel at the Vdara. *Compare* tab B *with* tab C.[1] The rates at the Vdara are clearly reasonable and were incurred by Plaintiffs to lodge both its out-of-state attorneys and its witnesses presented at trial.

Of the many flights required by Plaintiffs' out-of-state trial team a review of the supporting documents reveals 4 flights were flown at first class rates rather than economy rates. *See* tab D. Therefore, Plaintiffs move their request for an award of recoverable costs down by $959.69 representing a 50% reduction in the first class fare compared to the economy fare for those 4 flights.

III. THE AMOUNTS INCURRED FOR EDISCOVERY FEES WERE BOTH REASONABLE AND NECESSARY.

Amazingly, Defendants challenge both the need for and the reasonableness of the ediscovery fees in this case in which over 72,565 documents were ultimately exchanged by and between the parties.

As the Court well knows Defendants waited until right before depositions began to produce over 90% of its requested and ordered-to-be produced documents. It would have been humanly impossible to review all those documents to cull by witness those necessary to take a competent deposition or to prepare witnesses to give a competent deposition or

[1] Local hotels do not publish lodging rates for past dates, only for future dates. At tabs B and C the Court shall find the published rates at the JW Marriott and the Vdara for October, November and December (the same months as trial of this case in 2021) 2022.

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to oppose the multitude of motions filed by Defendants, or to advance the many discovery motions required by Defendants' dilatory conduct. Moreover, Defendants bled in a substantial number of document for review after discovery closed and before trial began. Similarly, to properly prepare for trial, it would have been humanly impossible to cull for persuasiveness-to-a-jury from those documents exchanged. McDonald Carano employs an ediscovery tool called Everlaw. McDonald Carano shared use of that tool with Plaintiffs' out-of-state co-counsel. McDonald Carano incurs a license fee based upon volume for use of that tool and passes on those fees to clients for payment without up-charge or profit. Use of such ediscovery tools is standard practice in complex commercial litigation, especially for cases as document-intensive as this one. To suggest that one can properly prosecute or defend a case like this one without an ediscovery tool is pure imagination. The ediscovery fees were clearly reasonable. And the necessity of such was mandated by the dilatory discovery practices employed by Defendants.

IV. THE COMPUTERIZED LEGAL RESEARCH FEES WERE BOTH REASONABLE AND NECESSARY.

Defendants complain that the computerized legal research fees are not sufficiently itemized and were impermissively redacted for work production protection. Defendants are wrong. At tab E the itemized fees are well-documented.

As the Court is well aware this case is but one of many, albeit the first to be tried, between health care providers like the specific Plaintiffs herein, and Defendants or similarly-affiliated defendants in other states. Those other cases have yet to go to trial. Defendants have been razor-focused not to reveal its work product for use in other states, and so too have Plaintiffs and their affiliates. The only information redacted from the invoices was Plaintiffs' counsels' detailed description of the specific legal issue computerized-search conducted, which is protected by the work product doctrine. *Phillips v. C.R. Bard, Inc.*, 290 F.R.D. 615, 634-635 (D. Nev. 2013) ("At its core the work product doctrine shelters the mental processes of the attorney, providing a privileged area within which [s]/he can analyze and prepare [her]/his client's case. The doctrine is an intensely practical one

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grounded in the realities of litigation in our adversary system." q*uoting U.S. v. Nobles*, 422 U.S. 225, 239, 95 S.Ct. 2160 (1975)). While Defendants would certainly like to have a peek under the tent at Plaintiffs' work product for use in other cases, they are not entitled to such and Plaintiffs should not be put to the Hobson's choice of either waiving an award of such recoverable costs or allowing Defendants insights to Plaintiffs' clearly protected work product. Defendants can certainly discern the dates of motion practice in this case and compare those dates against the dates of Plaintiffs' computerized research to discern the general topics of Plaintiffs' legal research. Once again, similar to ediscovery tools, computerized research has become a necessary tool in complex commercial litigation, in particular those cases in which multi-jurisdictional caselaw helps the Court in resolving in-state legal issues upon which the Nevada Supreme Court has yet to speak. NRS 18.005(17). Therefore, such fees are recoverable as costs.

V. WITH REDUCTION, PLAINTIFFS' REQUESTED COSTS FOR MEALS ARE REASONABLE AND NECESSARY.

There is an adage common in the military about armies performing better if their stomachs are not empty. The same holds true for legal teams. Simply put, Plaintiffs' counsel and its witnesses performed better when they were fed. But Defendants raise a good point - - even though it is highly doubted Defendants practiced what they are preaching. Counsel for Plaintiffs choose some of our community's better restaurants to feed their teams and witnesses during trial. It is acknowledged there were more cost-effective restaurants at which those individuals could have dined. For that reason, Plaintiffs respectfully submit that a 50% reduction for their business meals may be appropriate, thereby reducing Plaintiffs request from $22,938.40 to $11,469.20. By this suggestion, the undersigned counsel for Plaintiffs is <u>not</u> opining these restaurants charge unreasonable prices, but merely that a more moderate meal charge could had been incurred at a lesser restaurant.

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VI. PLAINTIFFS' REQUESTED COPYING COSTS ARE BOTH REASONABLE AND NECESSARY.

Defendants attempt to mislead this Court by suggesting Plaintiffs impermissively "redacted" its documentation substantiating its copying charges to the point Defendants cannot discern what they may have been for. Those documents are found at tab F. A simple review reveals Defendants are wrong.

The sum total of McDonald Carano's copy charges is $205.60. Tab F bates 0813-0839 summarizes those charges. The backup documentation is from the firm's PACER account with the U.S. Courts. Those invoices cover all copy and filing charges incurred by the firm for all of its cases (not just this one) for a set period of time (e.g. bates 0814 covers usage from 1/01/2020 to 3/21/2020). Behind each PACER invoice is the detail for the sums specific to this case. What has been redacted are the sums for other cases. The other invoices found at bates 1994-1998 and 1188-1211 were for preparation of trial exhibit binders for use by the Court, the Court's clerk, counsel and witnesses. Those expenses are mandated by compliance with the Court's and its clerk's requirements, as well as basic courtesies in supplying opposing counsel with a requested set of trial exhibits. Defendants should not now be heard to contend such expenses were either unreasonable or unnecessary.

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VII. CONCLUSION

Defendants made two cogent arguments in its motion to retax. The others border on frivolous. As a result, Plaintiffs have revised downward their request for an award of recoverable from $1,093,530.73 to $1,081,101.84. Plaintiffs respectfully request the Court grant such an award.

Dated this 13th day of April, 2022.

McDONALD CARANO LLP

By: /s/ Pat Lundvall

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on this 13th day of April, 2022, I caused a true and correct copy of the foregoing to be served via this Court's Electronic Filing system in the above-captioned case, upon the following:

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Attention: Mara Satterthwaite & Michelle Samaniego
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Steven D. Grierson
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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., a Nevada professional corporation; TEAM PHYSICIANS OF NEVADA-MANDAVIA, P.C., a Nevada professional corporation; CRUM, STEFANKO AND JONES, LTD. dba RUBY CREST EMERGENCY MEDICINE, a Nevada professional corporation, Plaintiffs, vs. UNITEDHEALTH GROUP, INC., a Delaware corporation; UNITED HEALTHCARE INSURANCE COMPANY, a Connecticut corporation; UNITED HEALTH CARE SERVICES INC., dba UNITEDHEALTHCARE, a Minnesota corporation; UMR, INC., dba UNITED MEDICAL RESOURCES, a Delaware corporation; OXFORD HEALTH PLANS, INC., a Delaware corporation; SIERRA HEALTH AND LIFE INSURANCE COMPANY, INC., a Nevada corporation;	Case No.: A-19-792978-B Dept. No.: XXVII **APPENDIX IN SUPPORT OF OPPOSITION TO DEFENDANTS' MOTION TO RETAX COSTS** Date of Hearing: 5/11/22 Time of Hearing: 9:30 a.m.

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SIERRA HEALTH-CARE OPTIONS, INC., a Nevada corporation; HEALTH PLAN OF NEVADA, INC., a Nevada corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

Plaintiffs file this Appendix of Exhibits in Support of its Opposition To Defendants' Motion to Retax Costs:

Exhibit No.	Exhibit Description	Bates No.
A	Alvarez & Marsal invoices	001-018
B	JW Marriott rates sheets	019-027
C	Vdara rate sheets	028-050
D	First class flights documentation	051-054
E	Westlaw charges documents	055-105
F	Copy charges invoices	106-161

Dated this 13th day of April, 2022.

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EXHIBIT A

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

August 12, 2021

Reference Invoice #:
832650-210806732

Kevin Leyendecker
Ahmad Zavitsanos Anaipakos Alavi & Mensing P.C.
1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Professional Services Rendered 07/01/2021 - 07/31/2021	$	64,670.00

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Total Amount Due	$	64,670.00

[redacted]

Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-210806732

August 12, 2021

Kevin Leyendecker
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1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Summary of Professional Fees 07/01/2021 - 07/31/2021				
Name	**Position**	**Hours**	**Rate**	**Fees**
Leathers, David	Managing Director	45.25	$ 650.00	$ 29,412.50
Lochabay, Donald	Managing Director	2.00	$ 650.00	$ 1,300.00
Evans, Craig	Senior Director	43.20	$ 525.00	$ 22,680.00
Sloan, Austin	Senior Associate	2.00	$ 295.00	$ 590.00
Vinh, Jason	Associate	42.75	$ 250.00	$ 10,687.50
Grand Total		**135.20**		**$ 64,670.00**

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: 713-571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-210806732

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.
Time Descriptions by Professional

Professional	Date	Description	Hours
Leathers, David	**7/23/2021**	Review and analyze complaint, court filings and initial database; teleconference with counsel.	3.00
	7/25/2021	Review and analyze documents and data file; prepare outline of draft report.	3.25
	7/26/2021	Review data files and prepare initial structure of report and opinion; working session with A&M team to discuss case/analyses.	5.00
	7/27/2021	Review and analyze documents and data files; working session with A&M team to discuss case/analyses.	7.00
	7/28/2021	Participate in teleconference with counsel; review work product and draft expert report; working session with A&M team to discuss iSight apportionment.	8.50
	7/29/2021	Review and finalize draft expert report and exhibits.	12.50
	7/30/2021	Finalize expert report; working session with A&M team regarding QC of expert report.	6.00
Leathers, David Total			**45.25**
Lochabay, Donald	**7/29/2021**	Review Leathers draft report and provide feedback on expert opinions.	1.00
	7/30/2021	Review Leathers draft report and provide feedback on expert opinions.	1.00
Lochabay, Donald Total			**2.00**
Evans, Craig	**7/26/2021**	Working session with A&M team to discuss case/analyses; review complaint; review data files; draft potential analyses.	4.70
	7/27/2021	Working session with A&M to discuss case/analyses; analysis of 'other' payor data; calls with counsel and Phillips.	9.50
	7/28/2021	Analysis of claims at issue; analysis of iSight claims; working session with A&M team to discuss iSight apportionment; call with counsel.	11.10
	7/29/2021	Update RICO damages with Sierra claims removed; draft report, analysis of Sierra agreement/rate; call with counsel.	10.60
	7/30/2021	Draft report; edits to tables and exhibits; working session with A&M team regarding QC of expert report.	7.30
Evans, Craig Total			**43.20**
Sloan, Austin	**7/26/2021**	SQL import and QC; working session with A&M team to discuss case/analyses.	1.50
	7/27/2021	Working session with A&M Team to discuss case/analyses.	0.50
Sloan, Austin Total			**2.00**
Vinh, Jason	**7/26/2021**	Working sessions with A&M team to discuss case/analyses; review of complaint; analysis of reimbursement data, iSight claims by CPT code/facility, and reimbursement rates.	9.00
	7/27/2021	Review of United productions, past agreements, and depositions; working session with A&M team to discuss case/analyses; analysis of claims over time; calculation of damages; reconciliation of iSight flags to claims data.	9.00
	7/28/2021	Review of United productions, MultiPlan agreement, and depositions; working sessions with A&M team to discuss iSight apportionment; writeup of expert report.	9.25
	7/29/2021	Compilation of documents cited in expert report; preparation of exhibits; analysis of ASO client costs and iSight rates and fees; QC of expert report.	10.00

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: 713-571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-210806732

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.
Time Descriptions by Professional

Professional	Date	Description	Hours
Vinh, Jason	**7/30/2021**	Review of out-of-network programs and depositions; updates to exhibits and expert report; working sessions with A&M team regarding QC of expert report.	5.50
Vinh, Jason Total			**42.75**
Total			**135.20**

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

September 3, 2021

Reference Invoice #:
832650-210901862

Kevin Leyendecker
Ahmad Zavitsanos Anaipakos Alavi & Mensing P.C.
1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Professional Services Rendered 08/01/2021 - 08/31/2021	$	4,120.00

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Total Amount Due	$	4,120.00

[redacted]

Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-210901862

September 3, 2021

Kevin Leyendecker
Ahmad Zavitsanos Anaipakos Alavi & Mensing P.C.
1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Summary of Professional Fees 08/01/2021 - 08/31/2021				
Name	**Position**	**Hours**	**Rate**	**Fees**
Leathers, David	Managing Director	0.25	$ 650.00	$ 162.50
Evans, Craig	Senior Director	7.30	$ 525.00	$ 3,832.50
Vinh, Jason	Associate	0.50	$ 250.00	$ 125.00
Grand Total		**8.05**		**$ 4,120.00**

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: 713-571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-210901862

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.
Time Descriptions by Professional

Professional	Date	Description	Hours
Leathers, David	**8/12/2021**	Review work papers.	0.25
Leathers, David Total			**0.25**
Evans, Craig	**8/10/2021**	Preparing work papers.	0.50
	8/11/2021	Preparing work papers.	4.20
	8/12/2021	Preparing work papers.	2.30
	8/13/2021	Preparing work papers.	0.30
Evans, Craig Total			**7.30**
Vinh, Jason	**8/12/2021**	Preparation and review of documents for production.	0.50
Vinh, Jason Total			**0.50**
Total			**8.05**

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

October 1, 2021

Reference Invoice #:
832650-210930916

Kevin Leyendecker
Ahmad Zavitsanos Anaipakos Alavi & Mensing P.C.
1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Professional Services Rendered 09/01/2021 - 09/30/2021	$	72,212.50
Total Amount Due	$	72,212.50

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[redacted]

Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-210930916

October 1, 2021

Kevin Leyendecker
Ahmad Zavitsanos Anaipakos Alavi & Mensing P.C.
1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Summary of Professional Fees 09/01/2021 - 09/30/2021				
Name	**Position**	**Hours**	**Rate**	**Fees**
Leathers, David	Managing Director	65.00	$ 650.00	$ 42,250.00
Lochabay, Donald	Managing Director	1.00	$ 650.00	$ 650.00
Evans, Craig	Senior Director	37.50	$ 525.00	$ 19,687.50
Vinh, Jason	Associate	38.50	$ 250.00	$ 9,625.00
Grand Total		**142.00**		**$ 72,212.50**

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: 713-571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-210930916

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.
Time Descriptions by Proport and provide feedback to prep for deposition.

Professional	Date	Description	Hours
Leathers, David	**9/2/2021**	Review and analyze opposing expert's report.	2.00
	9/3/2021	Review and analyze opposing expert's report; summarize comments for team.	1.00
	9/7/2021	Review supplemental data file and analysis of the same; review opposing expert's and Phillips reports; working session with A&M team regarding deposition preparation.	6.50
	9/8/2021	Analysis of claims data; correspondence with counsel; draft supplemental expert report; working session with A&M team regarding analysis of market claims data.	10.00
	9/9/2021	Review supplemental data analysis; finalize supplemental expert report.	5.50
	9/10/2021	Review additional documents and analysis; begin preparing for deposition testimony.	4.25
	9/11/2021	Provide documents requested by opposing counsel; prepare for deposition testimony.	2.75
	9/12/2021	Review work product, expert reports and other supplemental analysis.	7.75
	9/13/2021	Review deposition testimony and supplemental analysis from opposing experts; prepare for deposition testimony; working session with J. Vinh regarding review of depositions.	8.75
	9/14/2021	Review deposition testimony and supplemental analysis from opposing experts; prepare for deposition testimony	8.00
	9/15/2021	Provide deposition testimony.	8.50
Leathers, David Total			**65.00**
Lochabay, Donald	**9/7/2021**	Review opposing expert report and provide feedback to prepare for deposition.	1.00
Lochabay, Donald Total			**1.00**
Evans, Craig	**9/1/2021**	Review Bruce Deal report.	0.50
	9/2/2021	Review Bruce Deal report.	1.00
	9/7/2021	Data analysis for supplemental report; analysis of Philips/Deal reports; working sessions with A&M team regarding deposition preparation.	6.50
	9/8/2021	Data analysis for supplemental report; analysis of Philips/Deal reports; call with counsel; working session with A&M team regarding analysis of market claims data.	12.20
	9/9/2021	Data analysis for supplemental report.	6.40
	9/10/2021	Prepare in/out of network data files.	1.20
	9/13/2021	Analyses for deposition preparation.	7.40
	9/14/2021	Analyses for deposition preparation.	2.30
Evans, Craig Total			**37.50**
Vinh, Jason	**9/2/2021**	Review of rebuttal report.	2.00
	9/3/2021	Prepare documents for deposition preparation.	3.00
	9/7/2021	Prepare documents and report binder for deposition preparation; prepare tie-out binders for tables and exhibits; working session with A&M team regarding work plan and deposition preparation.	10.50
	9/8/2021	Prepare report binder for deposition prep; working session with A&M team regarding additional analysis of market claims data; research of in-network vs. out-of-network billing rates.	7.00
	9/9/2021	Research of in-network vs. out-of-network billing rates.	1.75

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: 713-571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-210930916

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.
Time Descriptions by Proport and provide feedback to prep for deposition.

Professional	Date	Description	Hours
Vinh, Jason	**9/13/2021**	Prepare binder of plaintiff/defendant deposition transcripts; working sessions with D. Leathers regarding depositions; review depositions of J. Bradley, J. Kienzle, and S. Mohler.	9.25
	9/14/2021	Review of depositions of K. Bristow.	4.00
	9/15/2021	Review of depositions of K. Bristow.	1.00
Vinh, Jason Total			**38.50**
Total			**142.00**

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

November 9, 2021

Reference Invoice #:
832650-211109105

Kevin Leyendecker
Ahmad Zavitsanos Anaipakos Alavi & Mensing P.C.
1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Professional Services Rendered 10/01/2021 - 10/31/2021	$	5,675.00
Out-of-Pocket Expenses	$	8.66
Total Amount Due	$	5,683.66

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-211109105

November 9, 2021

Kevin Leyendecker
Ahmad Zavitsanos Anaipakos Alavi & Mensing P.C.
1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Summary of Professional Fees 10/01/2021 - 10/31/2021				
Name	**Position**	**Hours**	**Rate**	**Fees**
Leathers, David	Managing Director	5.00	$ 650.00	$ 3,250.00
Evans, Craig	Senior Director	2.00	$ 525.00	$ 1,050.00
Vinh, Jason	Associate	5.50	$ 250.00	$ 1,375.00
Grand Total		**12.50**		**$ 5,675.00**

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: 713-571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-211109105

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.
Time Descriptions by Professional

Professional	Date	Description	Hours
Leathers, David	**10/8/2021**	Review deposition testimony.	1.00
	10/29/2021	Review reports and work product; prepare for trial testimony.	4.00
Leathers, David Total			**5.00**
Evans, Craig	**10/26/2021**	Review 80th percentile billed charges for Fair Health data.	2.00
Evans, Craig Total			**2.00**
Vinh, Jason	**10/19/2021**	Review and analysis of deposition of D. Leathers for trial preparation.	4.50
	10/29/2021	Prepare documents for trial preparation.	1.00
Vinh, Jason Total			**5.50**
Total			**12.50**

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

January 18, 2022

Reference Invoice #:
832650-2112071820

Kevin Leyendecker
Ahmad Zavitsanos Anaipakos Alavi & Mensing P.C.
1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Professional Services Rendered 11/01/2021 - 11/30/2021	$	115,967.50
Out-of-Pocket Expenses	$	1,405.83
Total Amount Due	$	117,373.33

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: (713) 571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-2112071820

January 18, 2022

Kevin Leyendecker
Ahmad Zavitsanos Anaipakos Alavi & Mensing P.C.
1221 McKinney St., Suite 2500
Houston, TX 77010

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.

Summary of Professional Fees 11/01/2021 - 11/30/2021				
Name	**Position**	**Hours**	**Rate**	**Fees**
Leathers, David	Managing Director	102.25	$ 650.00	$ 66,462.50
Evans, Craig	Senior Director	71.20	$ 525.00	$ 37,380.00
Vinh, Jason	Senior Associate	48.50	$ 250.00	$ 12,125.00
Grand Total		**221.95**		**$ 115,967.50**

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Alvarez & Marsal Disputes and Investigations, LLC
700 Louisiana Street, Suite 3300
Houston, TX 77002
Telephone: 713-571-2400
Fax: (713) 547-3697

Reference Invoice #:
832650-2112071820

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.
Time Descriptions by Professional

Professional	Date	Description	Hours
Leathers, David	**11/1/2021**	Begin trial preparation.	1.00
	11/2/2021	Trial preparation; working sessions with J. Vinh regarding trial preparation; listen to opening arguments.	8.00
	11/3/2021	Trial preparation; working session with A&M team regarding supplemental analysis.	5.50
	11/4/2021	Trial preparation meeting with counsel.	8.00
	11/5/2021	Trial preparation; review documents; prepare supplemental analysis and trial demonstratives; prepare direct testimony; working session with A&M team regarding trial preparation.	5.00
	11/6/2021	Trial preparation; review documents; prepare supplemental analysis and trial demonstratives; prepare direct testimony.	4.00
	11/8/2021	Trial preparation; review documents; prepare supplemental analysis and trial demonstratives; prepare direct testimony.	1.00
	11/9/2021	Trial preparation; review documents; prepare supplemental analysis and trial demonstratives; prepare direct testimony.	2.50
	11/10/2021	Trial preparation; review documents; prepare supplemental analysis and trial demonstratives; prepare direct testimony; working sessions with A&M team regarding trial preparation and demonstratives.	7.00
	11/11/2021	Trial preparation; review documents; prepare supplemental analysis and trial demonstratives; prepare direct testimony; working session with J. Vinh regarding demonstratives.	4.50
	11/12/2021	Trial preparation; review documents; prepare supplemental analysis and trial demonstratives; prepare direct testimony.	5.25
	11/13/2021	Trial preparation; review documents; prepare supplemental analysis and trial demonstratives; prepare direct testimony.	2.50
	11/14/2021	Attend trial and provide expert testimony.	8.00
	11/15/2021	Attend trial and provide expert testimony; working session with J. Vinh regarding trial and demonstratives.	10.00
	11/16/2021	Attend trial and provide expert testimony; working session with C. Evans regarding trial.	12.00
	11/17/2021	Attend trial and provide expert testimony.	12.00
	11/18/2021	Attend trial and provide expert testimony; working session with J. Vinh to assist with location of documents for counsel.	6.00
Leathers, David Total			**102.25**

Evans, Craig	**11/1/2021**	Load updated claims at issue; update analyses.	1.80
	11/2/2021	Update analyses; review prior reports & exhibits.	4.30
	11/3/2021	Review prior reports & exhibits; working session with A&M team regarding supplemental analysis; data analysis; create trial demonstratives.	11.10
	11/4/2021	Data analysis; create trial demonstratives.	9.10
	11/5/2021	Data analysis; create trial demonstratives; assess for reasonableness; analyze damages; working session with A&M team regarding trial preparation.	8.30
	11/6/2021	Data analysis; create trial demonstratives; assess for reasonableness; analyze damages.	2.50
	11/7/2021	Data analysis; create trial demonstratives; conduct pre-2017 market analysis.	1.30

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Alvarez & Marsal Disputes and Investigations, LLC
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Houston, TX 77002
Telephone: 713-571-2400
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Reference Invoice #:
832650-2112071820

Fremont Emergency Services, Ltd. et al. v. UnitedHealth Group, Inc. et al.
Time Descriptions by Professional

Professional	Date	Description	Hours
Evans, Craig	**11/8/2021**	Data analysis; create trial demonstratives; conduct pre-2017 market analysis.	4.50
	11/9/2021	Analysis of market reasonableness; create trial demonstratives.	3.80
	11/10/2021	Update charts & demonstratives; filter market data; working sessions with A&M team regarding trial preparation and demonstratives.	5.30
	11/11/2021	Update charts & demonstratives.	3.00
	11/13/2021	Update charts & demonstratives.	1.00
	11/14/2021	Update charts & demonstratives; trial preparation.	2.10
	11/15/2021	Preparation call with counsel.	6.30
	11/16/2021	Update charts & demonstratives; trial preparation; working	4.70
	11/17/2021	Analysis of Fair Health means and medians.	2.10
Evans, Craig Total			**71.20**
Vinh, Jason	**11/2/2021**	Prepare documents and binders for trial preparation; working sessions with D. Leathers regarding trial preparation.	3.50
	11/3/2021	Prepare documents and binders for trial preparation; working sessions with A&M team regarding supplemental analysis; prepare demonstratives for trial.	10.50
	11/4/2021	Prepare demonstratives for trial.	1.00
	11/5/2021	Working session with A&M team regarding trial preparation.	0.50
	11/8/2021	Prepare demonstratives for trial.	3.25
	11/9/2021	Prepare demonstratives for trial.	4.75
	11/10/2021	Prepare demonstratives for trial; prepare documents for trial preparation; working sessions with A&M team regarding trial preparation and demonstratives; edits to demonstratives.	7.50
	11/11/2021	Edits to demonstratives; working sessions with D. Leathers regarding demonstratives; review and list additional documents received.	5.75
	11/13/2021	Edits to demonstratives; review and list additional documents received.	1.00
	11/14/2021	Edits to demonstratives.	1.25
	11/15/2021	Edits to demonstratives; working sessions with D. Leathers regarding trial and demonstratives.	9.25
	11/18/2021	Working session with D. Leathers to assist with location of documents for counsel.	0.25
Vinh, Jason Total			**48.50**
Total			**221.95**

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EXHIBIT B

Dates
Sun, Oct 2, 2022 – Mon, Oct 3, 2022

Rooms & Guests
1 Room : 1 Adult

EDIT

Please note - A daily resort fee of USD 39 plus tax will be added to the room rate and includes valet parking, Internet and a daily resort credit of USD 10.

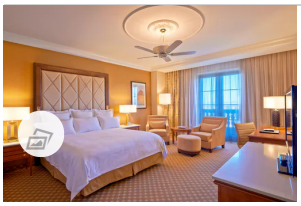
Please note - See travelguidance.marriott.com for travel notices relating to COVID-19.

Standard Rates	Prepay and Save	Deals and Packages
Most Flexible	With Restrictions	Special Savings
From 254 USD / night	From 223 USD / night	From 233 USD / night

Show rates with taxes and all fees

Deluxe Guest room, 1 King

Room Details



Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

223 USD / night SELECT

Prepay Non-refundable Non-changeable

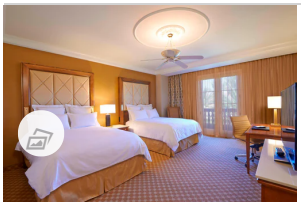
- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

227 USD / night SELECT

Deluxe Guest room, 2 Queen

Room Details



Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

232 USD / night SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

236 USD / night SELECT

Deluxe Guest room, 1 King, Balcony

Room Details

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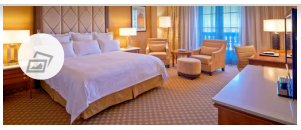
Dates
Sun, Oct 2, 2022 – Mon, Oct 3, 2022

Rooms & Guests
1 Room : 1 Adult

EDIT



refundable Non-changeable
- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

236 USD / night SELECT

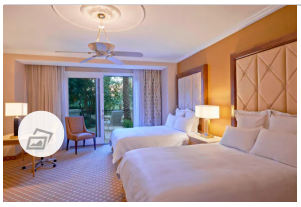
Prepay Non-refundable Non-changeable
- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

241 USD / night SELECT

Deluxe Guest room, 2 Queen, Balcony

Room Details



Member Rate Prepay Non-refundable Non-changeable
- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

245 USD / night SELECT

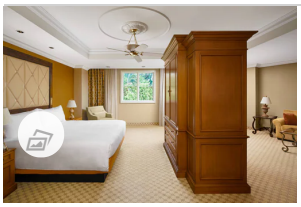
Prepay Non-refundable Non-changeable
- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

249 USD / night SELECT

Junior Suite, Larger Studio, 1 King

Room Details



Member Rate Prepay Non-refundable Non-changeable
- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

275 USD / night SELECT

Prepay Non-refundable Non-changeable
- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

280 USD / night SELECT

1 Bedroom Suite, 1 King, scenic view

Room Details

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Dates
Sun, Oct 2, 2022 – Mon, Oct 3, 2022

Rooms & Guests
1 Room : 1 Adult

EDIT

refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

318 USD / night

SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

324 USD / night

SELECT

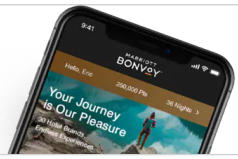
Other Options

Hotels nearby

Vacation Packages - Room + Flight

Phone Reservations

Marriott Reservations in the US and Canada: 1-888-236-2427
The Ritz-Carlton, US and Canada: 800-542-8680
Worldwide: CALL YOUR RESERVATION CENTER



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prod13,C2A93A93-530D-56EA-A7FB-BC794C483BB9,rel-R22.4.1

Dates
Fri, Nov 4, 2022 – Sat, Nov 5, 2022

Rooms & Guests
1 Room : 1 Adult

EDIT

Please note - A daily resort fee of USD 39 plus tax will be added to the room rate and includes valet parking, Internet and a daily resort credit of USD 10.

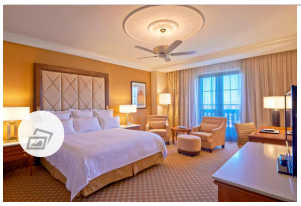
Please note - See travelguidance.marriott.com for travel notices relating to COVID-19.

Standard Rates	Prepay and Save	Deals and Packages
Most Flexible	With Restrictions	Special Savings
From 265 USD / night	From 233 USD / night	From 279 USD / night

Show rates with taxes and all fees

Deluxe Guest room, 1 King

Room Details



Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

233 USD / night

SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

245 USD / night

SELECT

Deluxe Guest room, 2 Queen

Room Details

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

242 USD / night

SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

254 USD / night

SELECT

Deluxe Guest room, 1 King, Balcony

Room Details

016892

016892

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

246 USD / night

SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

258 USD / night

SELECT

Deluxe Guest room, 2 Queen, Balcony

Room Details

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

254 USD / night

SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

267 USD / night

SELECT

Junior Suite, Larger Studio, 1 King

Room Details

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

283 USD / night

SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

298 USD / night

SELECT

1 Bedroom Suite, 1 King, scenic view

Room Details

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

325 USD / night SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

342 USD / night SELECT

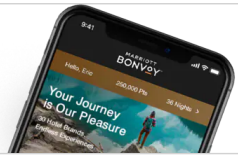
Other Options

Hotels nearby

Vacation Packages - Room + Flight

Phone Reservations

Marriott Reservations in the US and Canada: 1-888-236-2427
The Ritz-Carlton, US and Canada: 800-542-8680
Worldwide: CALL YOUR RESERVATION CENTER



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prod13,C2A93A93-530D-56EA-A7FB-BC794C483BB9,rel-R22.4.1

Dates
Mon, Dec 5, 2022 – Tue, Dec 6, 2022

Rooms & Guests
1 Room : 1 Adult

EDIT

Please note - A daily resort fee of USD 39 plus tax will be added to the room rate and includes valet parking, Internet and a daily resort credit of USD 10.

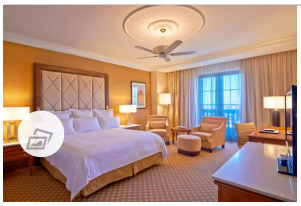
Please note - See travelguidance.marriott.com for travel notices relating to COVID-19.

Standard Rates	Prepay and Save	Deals and Packages
Most Flexible	With Restrictions	Special Savings
From 254 USD / night	From 223 USD / night	From 233 USD / night

Show rates with taxes and all fees

Deluxe Guest room, 1 King

Room Details



Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

223 USD / night SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

227 USD / night SELECT

Deluxe Guest room, 2 Queen

Room Details

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

232 USD / night SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

236 USD / night SELECT

Deluxe Guest room, 1 King, Balcony

Room Details

016895
016895

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

236 USD / night

SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

241 USD / night

SELECT

Deluxe Guest room, 2 Queen, Balcony

Room Details

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

245 USD / night

SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

249 USD / night

SELECT

Junior Suite, Larger Studio, 1 King

Room Details

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

275 USD / night

SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

280 USD / night

SELECT

1 Bedroom Suite, 1 King, scenic view

Room Details

Member Rate Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes
- See Rate details

Rate Details

318 USD / night SELECT

Prepay Non-refundable Non-changeable

- Prepay in full
- Non-refundable if cancelled more than 1 day after booking
- No changes

Rate Details

324 USD / night SELECT

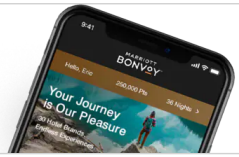
Other Options

Hotels nearby

Vacation Packages - Room + Flight

Phone Reservations

Marriott Reservations in the US and Canada: 1-888-236-2427
The Ritz-Carlton, US and Canada: 800-542-8680
Worldwide: CALL YOUR RESERVATION CENTER



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prod13,C2A93A93-530D-56EA-A7FB-BC794C483BB9,rel-R22.4.1

016898

016898

EXHIBIT C

016898

VDARA - OCTOBER 2022

ROOM TYPES & RATES

SEE NEW DATES
Check In: Monday, 10/03/2022 | Check Out: Tuesday, 10/04/2022
Rooms: 1 | Adults: 1 | Kids: 0

STUDIO
Jackpot! One of the best rates available for the dates you selected.
View room details, amenities & policies

$260 / night
Included FREE:
Free Cancellation

RESERVE
Hurry, reserve offer!

016899
016899

016899

016900

STUDIO PARLOR SUITE

View room details, amenities & policies

016900

$265 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016900

016901

STUDIO TWO QUEEN

View room details, amenities & policies

016901

$270 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016901

016902

STAY WELL STUDIO

View room details, amenities & policies

016902

$270 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016902

STUDIO FOUNTAIN VIEW

View room details, amenities & policies

$280 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016903

016903

016903

016904

CITY CORNER SUITE

View room details, amenities & policies

016904

$400 / night

Included FREE:

Free Cancellation

RESERVE

Hurry, reserve offer!

016904

016905

VDARA SUITE

View room details, amenities & policies

$415 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016905

016905

016906

EXECUTIVE CORNER SUITE

View room details, amenities & policies

016906

$425 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016906

VDARA - NOVEMBER 2022

ROOM TYPES & RATES

SEE NEW DATES
Check In: Friday, 11/04/2022 | Check Out: Saturday, 11/05/2022
Rooms: 1 | Adults: 1 | Kids: 0

STUDIO
Jackpot! One of the best rates available for the dates you selected.
View room details, amenities & policies

$399 / night
Included FREE:
Free Cancellation

RESERVE
Hurry, reserve offer!

016907
016907

016907

STUDIO PARLOR SUITE

View room details, amenities & policies

$409 / night

Included FREE:
Free Cancellation

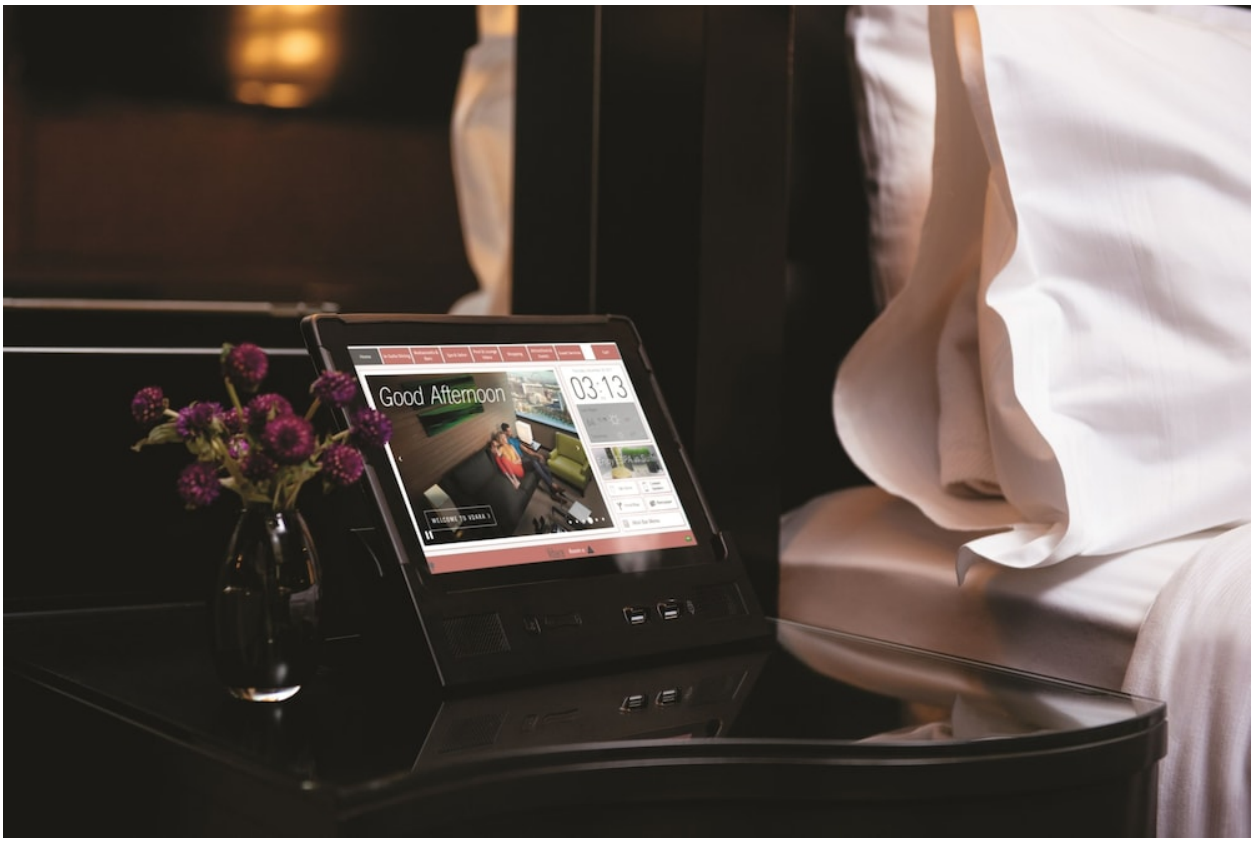
RESERVE

Hurry, reserve offer!

016908

016908

016908



016909

STAY WELL STUDIO

View room details, amenities & policies

$409 / night

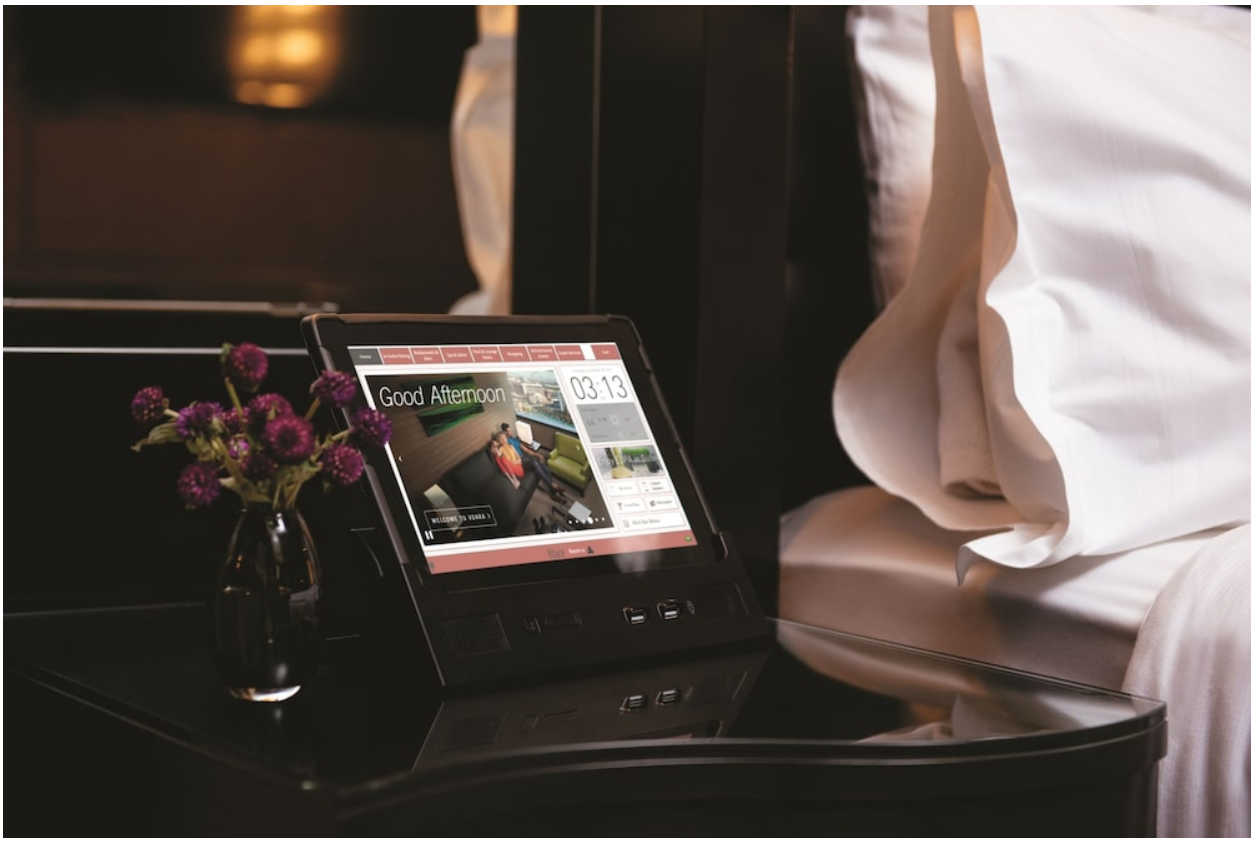
Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016909

016909



016910

STUDIO TWO QUEEN

View room details, amenities & policies

016910

$419 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016910

STUDIO FOUNTAIN VIEW

View room details, amenities & policies

$520 / night

Included FREE:

Free Cancellation

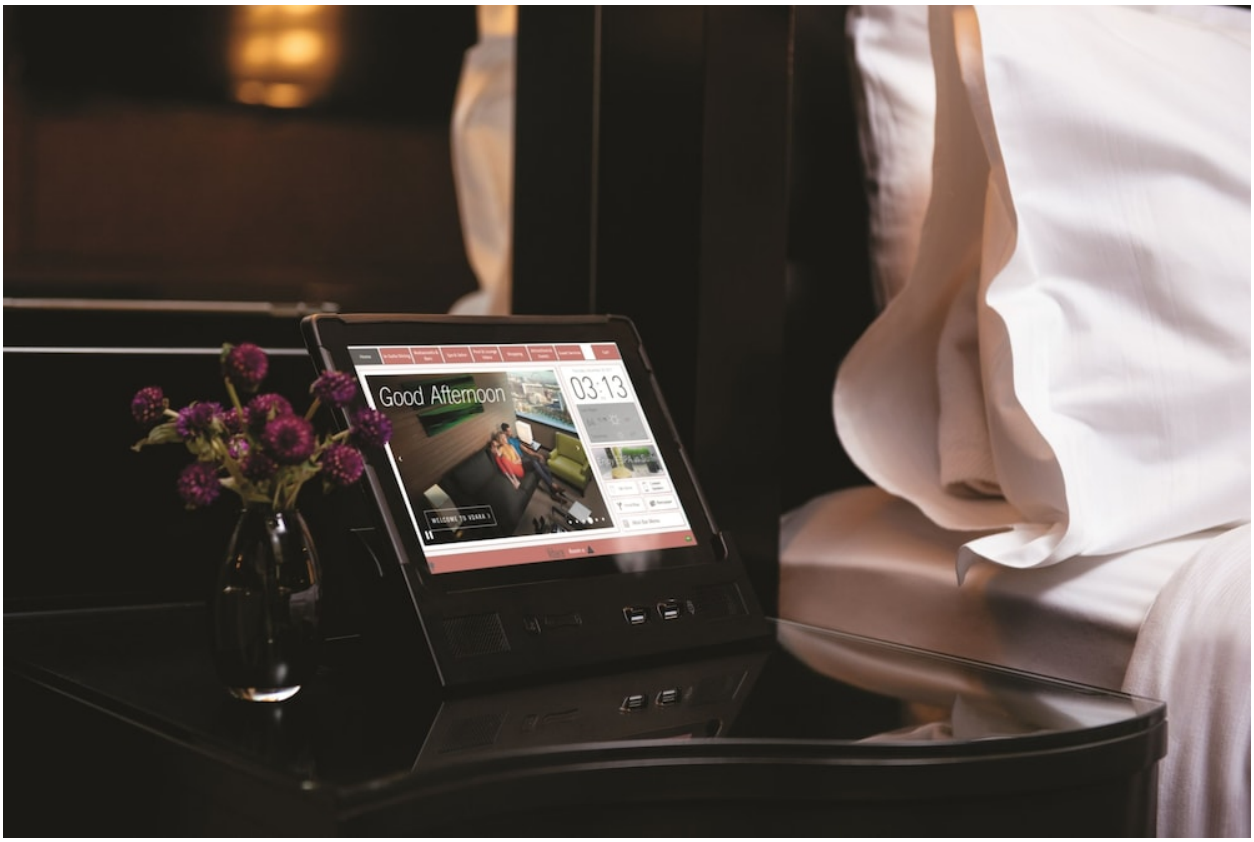
RESERVE

Hurry, reserve offer!

016911

016911

016911



016912

CITY CORNER SUITE

View room details, amenities & policies

$560 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016912

016912

EXECUTIVE CORNER SUITE

View room details, amenities & policies

$595 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016913

016913

016913

VDARA - DECEMBER 2022

ROOM TYPES & RATES

SEE NEW DATES
Check In: Friday, 12/02/2022 | Check Out: Saturday, 12/03/2022
Rooms: 1 | Adults: 1 | Kids: 0

STUDIO
Jackpot! One of the best rates available for the dates you selected.
View room details, amenities & policies

$239 / night
Included FREE:
Free Cancellation

RESERVE
Hurry, reserve offer!

016914
016914

016914

STUDIO PARLOR SUITE

View room details, amenities & policies

$249 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016915

016915

016915

016916

STAY WELL STUDIO

View room details, amenities & policies

016916

$249 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016916

STUDIO TWO QUEEN

View room details, amenities & policies

$259 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016917

016917

016917

STUDIO FOUNTAIN VIEW

View room details, amenities & policies

$280 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016918

016918

016918

016919

CITY CORNER SUITE

View room details, amenities & policies

016919

$475 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016919

VDARA SUITE

View room details, amenities & policies

$499 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016920

016920

016920

EXECUTIVE CORNER SUITE

View room details, amenities & policies

$509 / night

Included FREE:
Free Cancellation

RESERVE

Hurry, reserve offer!

016921

016921

016921

016922

016922

EXHIBIT D

016922

Angie Townsend

From: United Airlines, Inc. <Receipts@united.com>
Sent: Wednesday, November 24, 2021 10:58 PM
To: Angie Townsend
Subject: eTicket Itinerary and Receipt for Confirmation ESLJFH

UNITED

Wed, Nov 24, 2021

Thank you for choosing United.

A receipt of your purchase is shown below. Please retain this email receipt for your records.

Note: There are travel restrictions in place due to the coronavirus. Check our Important notices page for the latest updates

Get ready for your trip: Visit the Travel-Ready Center, your one-stop digital assistant, to find out about important travel requirements specific to your trip.

016923

016923

Confirmation Number:

ESLJFH

Flight 1 of 4 UA2313 — Class: United First (P)

Mon, Oct 18, 2021
07:25 AM
Houston, TX, US (IAH)

Mon, Oct 18, 2021
08:39 AM
Las Vegas, NV, US (LAS)

Flight 2 of 4 UA1179 — Class: United Economy (V)

Wed, Nov 24, 2021
03:30 PM
Las Vegas, NV, US (LAS)

Wed, Nov 24, 2021
08:30 PM
Houston, TX, US (IAH)

Flight 3 of 4 UA1403 — Class: United First (P)

Sun, Nov 28, 2021

Sun, Nov 28, 2021

07:10 PM
Houston, TX, US (IAH)

08:34 PM
Las Vegas, NV, US (LAS)

Flight 4 of 4 UA1179 | Class: United First (P)

Tue, Nov 30, 2021
03:30 PM
Las Vegas, NV, US (LAS)

Tue, Nov 30, 2021
08:30 PM
Houston, TX, US (IAH)

Traveler Details

ZAVITSANOS/JOHN
eTicket number: **0162380516535**
Frequent Flyer: **UA-XXXXX541 Premier 1K®**

Seats: **IAH-LAS 01E**
LAS-IAH 04E
LAS-IAH 01E
IAH-LAS -----
IAH-LAS

Excess Bag (0169948994351)

016924

016924

Purchase Summary

Method of payment:	**Miscellaneous Document American Express ending in 1450**
Date of purchase:	**Thu, Nov 25, 2021**
Airfare:	**985.11 USD**
U.S. Transportation Tax:	**73.88 USD**
U.S. Flight Segment Tax:	**12.90 USD**
September 11th Security Fee:	**16.80 USD**
U.S. Passenger Facility Charge:	**13.50 USD**
Total Per Passenger:	**1102.19 USD**
Total:	**1102.19 USD**

AKT Amex

Additional Purchase Summary

Method of payment:	**American Express ending in 1625**

TMH010 - Travel for United's sealing hearing

Tuesday, January 18, 2022 at 16:21:01 Central Standard Time

Subject: eTicket Itinerary and Receipt for Confirmation PNZ12D
Date: Wednesday, January 5, 2022 at 11:34:18 AM Central Standard Time
From: United Airlines, Inc.
To: Jason McManis

UNITED

Wed, Jan 05,

Thank you for choosing United.

A receipt of your purchase is shown below. Please retain this email receipt for your records.

Note: There are travel restrictions in place due to the coronavirus. Check our Important notice page for the latest updates

Get ready for your trip: Visit the Travel-Ready Center, your one-stop digital assistant, to find about important travel requirements specific to your trip.

Confirmation Number:

PNZ12D

016925

016925

Flight 1 of 2 UA2086 | Class: United Firs

Tue, Jan 11, 2022
04:24 PM
Houston, TX, US (IAH)

Tue, Jan 11,
05:50 P
Las Vegas, NV, US

Flight 2 of 2 UA1181 | Class: United Firs

Thu, Jan 13, 2022
06:00 AM

Thu, Jan 13,
11:00 A

016925

Las Vegas, NV, US (LAS) Houston, TX, US

Traveler Details

MCMANIS/JASONS

eTicket number: 0162386837340 Seats: IAH-LAS (

Frequent Flyer: UA-XXXXX190 Premier Gold LAS-IAH (

Premium Cabin Upgrade (0169964437195) IAH-I

Purchase Summary

Method of payment:	Visa ending in 6
Date of purchase:	Wed, Jan 05, 2
Airfare:	509.76 U
U.S. Transportation Tax:	38.24 U
U.S. Flight Segment Tax:	9.00 U
September 11th Security Fee:	11.20 U
U.S. Passenger Facility Charge:	9.00 U
Total Per Passenger:	577.20 U
Total:	**577.20 U**

016926

016926

Additional Purchase Summary

Method of payment:	Visa ending in 6
Date of purchase:	Wed, Jan 05, 2
Premium Cabin Upgrade (Reference Number: 0169964437195)	240.00 U
Total:	**240.00 U**

817.20

Carbon Footprint

Your estimated carbon footprint for this trip is **0.50654 tonnes of CO2.**

You can reduce your environmental impact by participating in our CarbonChoice program which supports projects that reduce greenhouse gases. Learn more

Fare Rules

Additional charges may apply for changes in addition to any fare rules listed

NONREF/0VALUAFTDPT

EXHIBIT E

Account Group: MCW Group
Date Range: April 01, 2019 - April 30, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-03							
User Name PERACH,AMANDA M (10248833)							
Day 04/10/2019							
Totals for Included		4			0.00 USD	0.00 USD	0.00 USD
Totals for Day 04/10/2019		4			0.00 USD	0.00 USD	0.00 USD
Day 04/12/2019							
Totals for Included		6			466.00 USD	186.39 USD	186.39 USD
Totals for Day 04/12/2019		6			466.00 USD	186.39 USD	186.39 USD
Day 04/15/2019							
Totals for Included		11			143.00 USD	57.20 USD	57.20 USD
Totals for Day 04/15/2019		11			143.00 USD	57.20 USD	57.20 USD
Totals for User Name PERACH,AMANDA M (10248833)		21			609.00 USD	243.59 USD	243.59 USD
Totals for Client 019438-03		21			609.00 USD	243.59 USD	243.59 USD
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 04/12/2019							
Totals for Included		13			609.00 USD	243.59 USD	243.59 USD
Totals for Excluded		2			204.00 USD	0.00 USD	204.00 USD
Totals for Day 04/12/2019		15			813.00 USD	243.59 USD	447.59 USD
Day 04/13/2019							
Totals for Included		8			143.00 USD	57.20 USD	57.20 USD
Totals for Day 04/13/2019		8			143.00 USD	57.20 USD	57.20 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		23			956.00 USD	300.79 USD	504.79 USD
Totals for Client 019438-3		23			956.00 USD	300.79 USD	504.79 USD

016928
016928

Account Group: MCW Group
Date Range: May 01, 2019 - May 31, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 05/22/2019							
Totals for Included		9			572.00 USD	243.98 USD	243.98 USD
Totals for Day 05/22/2019		9			572.00 USD	243.98 USD	243.98 USD
Day 05/24/2019							
Totals for Included		11			286.00 USD	121.99 USD	121.99 USD
Totals for Day 05/24/2019		11			286.00 USD	121.99 USD	121.99 USD
Day 05/29/2019							
Totals for Included		73			2,916.00 USD	1,243.77 USD	1,243.77 USD
Totals for Excluded		1			4.00 USD	0.00 USD	4.00 USD
Totals for Day 05/29/2019		74			2,920.00 USD	1,243.77 USD	1,247.77 USD
Day 05/30/2019							
Totals for Included		24			1,430.00 USD	609.94 USD	609.94 USD
Totals for Day 05/30/2019		24			1,430.00 USD	609.94 USD	609.94 USD
Day 05/31/2019							
Totals for Included		3			245.00 USD	104.50 USD	104.50 USD
Totals for Day 05/31/2019		3			245.00 USD	104.50 USD	104.50 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		121			5,453.00 USD	2,324.17 USD	2,328.17 USD

Account Group: MCW Group
Date Range: May 01, 2019 - May 31, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Totals for Client 019438-3		121			5,453.00 USD	2,324.17 USD	2,328.17 USD

016930

016930

Account Group: MCW Group
Date Range: June 01, 2019 - June 30, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge
[redacted]					
Client 019438-3					
User Name GALLAGHER,KRISTY (4406047)					
Day 06/13/2019					
Totals for Included		13			776.00 USD
Totals for Day 06/13/2019		13			776.00 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		13			776.00 USD
Totals for Client 019438-3		13			776.00 USD
[redacted]					
Client 019438-3					
User Name GALLAGHER,KRISTY (4406047)					
Day 06/03/2019					
Totals for Included		7			286.00 USD
Totals for Day 06/03/2019		7			286.00 USD
Day 06/07/2019					
Totals for Included		14			644.00 USD
Totals for Excluded		2			8.00 USD
Totals for Day 06/07/2019		16			652.00 USD
Day 06/11/2019					
Totals for Included		6			572.00 USD
Totals for Day 06/11/2019		6			572.00 USD
Day 06/12/2019					
Totals for Included		2			0.00 USD
Totals for Day 06/12/2019		2			0.00 USD
Day 06/21/2019					
Totals for Included		4			0.00 USD
Totals for Day 06/21/2019		4			0.00 USD
Day 06/24/2019					
Totals for Included		30			1,001.00 USD
Totals for Day 06/24/2019		30			1,001.00 USD
Day 06/25/2019					
Totals for Included		5			286.00 USD
Totals for Day 06/25/2019		5			286.00 USD
Day 06/26/2019					
Totals for Included		4			143.00 USD
Totals for Day 06/26/2019		4			143.00 USD

016931

Account Group: MCW Group
Date Range: June 01, 2019 - June 30, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge
Day 06/28/2019					
Totals for Included		7			143.00 USD
Totals for Day 06/28/2019		7			143.00 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		81			3,083.00 USD
User Name PERACH,AMANDA M (10248833)					
Day 06/17/2019					
Totals for Included		34			715.00 USD
Totals for Day 06/17/2019		34			715.00 USD
Day 06/18/2019					
Totals for Included		38			1,144.00 USD
Totals for Day 06/18/2019		38			1,144.00 USD
Day 06/24/2019					
Totals for Included		2			0.00 USD
Totals for Day 06/24/2019		2			0.00 USD
Day 06/25/2019					
Totals for Included		22			1,144.00 USD
Totals for Day 06/25/2019		22			1,144.00 USD
Day 06/26/2019					
Totals for Included		3			36.00 USD
Totals for Day 06/26/2019		3			36.00 USD
Day 06/27/2019					
Totals for Included		40			286.00 USD
Totals for Day 06/27/2019		40			286.00 USD
Totals for User Name PERACH,AMANDA M (10248833)		139			3,325.00 USD
Totals for Client 019438-3		220			6,408.00 USD

Account Group: MCW Group
Date Range: July 01, 2019 - July 31, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 07/19/2019							
Totals for Included		4			429.00 USD	141.35 USD	141.35 USD
Totals for Day 07/19/2019		4			429.00 USD	141.35 USD	141.35 USD
Day 07/23/2019							
Totals for Included		11			429.00 USD	141.35 USD	141.35 USD
Totals for Day 07/23/2019		11			429.00 USD	141.35 USD	141.35 USD

Account Group: MCW Group
Date Range: July 01, 2019 - July 31, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Day 07/27/2019							
Totals for Included		3			143.00 USD	47.12 USD	47.12 USD
Totals for Day 07/27/2019		3			143.00 USD	47.12 USD	47.12 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		18			1,001.00 USD	329.82 USD	329.82 USD
Totals for Client 019438-3		18			1,001.00 USD	329.82 USD	329.82 USD

016934

016934

Account Group: MCW Group
Date Range: August 01, 2019 - August 31, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Day 08/14/2019							
Totals for Included		22			858.00 USD	373.14 USD	373.14 USD
Totals for Day 08/14/2019		22			858.00 USD	373.14 USD	373.14 USD
Totals for User Name PERACH,AMANDA M (10248833)		57			1,287.00 USD	559.71 USD	559.71 USD
Totals for Client 019438-3		58			1,287.00 USD	559.71 USD	559.71 USD

Client 019698-3

Account Group: MCW Group
Date Range: September 01, 2019 - September 30, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 09/26/2019							
Totals for Included		13			572.00 USD	253.15 USD	253.15 USD
Totals for Day 09/26/2019		13			572.00 USD	253.15 USD	253.15 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		13			572.00 USD	253.15 USD	253.15 USD
Totals for Client 019438-3		13			572.00 USD	253.15 USD	253.15 USD

016936
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[redacted]

Account Group: MCW Group
Date Range: October 01, 2019 - October 31, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 10/17/2019							
Totals for Included		3			143.00 USD	46.75 USD	46.75 USD
Totals for Day 10/17/2019		3			143.00 USD	46.75 USD	46.75 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		3			143.00 USD	46.75 USD	46.75 USD
Totals for Client 019438-3		3			143.00 USD	46.75 USD	46.75 USD
[redacted]							

016937

016937

Account Group: MCW Group
Date Range: November 01, 2019 - November 30, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name (4406047)							
Day 11/11/2019							
Totals for Included		9			143.00 USD	60.47 USD	60.47 USD
Totals for Day 11/11/2019		9			143.00 USD	60.47 USD	60.47 USD
Day 11/30/2019							
Totals for Included		25			429.00 USD	181.40 USD	181.40 USD
Totals for Day 11/30/2019		25			429.00 USD	181.40 USD	181.40 USD
Totals for User Name (4406047)		34			572.00 USD	241.87 USD	241.87 USD
Totals for Client 019438-3		34			572.00 USD	241.87 USD	241.87 USD
[redacted]							

Account Group: MCW Group
Date Range: December 01, 2019 - December 31, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 12/01/2019							
Totals for Included		9			286.00 USD	131.06 USD	131.06 USD
Totals for Day 12/01/2019		9			286.00 USD	131.06 USD	131.06 USD
Day 12/03/2019							
Totals for Included		19			572.00 USD	262.12 USD	262.12 USD
Totals for Day 12/03/2019		19			572.00 USD	262.12 USD	262.12 USD
Day 12/04/2019							
Totals for Included		39			715.00 USD	327.65 USD	327.65 USD
Totals for Day 12/04/2019		39			715.00 USD	327.65 USD	327.65 USD
Day 12/05/2019							
Totals for Included		9			143.00 USD	65.53 USD	65.53 USD
Totals for Day 12/05/2019		9			143.00 USD	65.53 USD	65.53 USD

Account Group: MCW Group
Date Range: December 01, 2019 - December 31, 2019
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Day 12/06/2019							
Totals for Included		11			429.00 USD	196.59 USD	196.59 USD
Totals for Day 12/06/2019		11			429.00 USD	196.59 USD	196.59 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		87			2,145.00 USD	982.95 USD	982.95 USD
User Name PERACH,AMANDA M (10248833)							
Day 12/16/2019							
Totals for Included		24			143.00 USD	65.53 USD	65.53 USD
Totals for Day 12/16/2019		24			143.00 USD	65.53 USD	65.53 USD
Day 12/19/2019							
Totals for Included		16			1,430.00 USD	655.30 USD	655.30 USD
Totals for Day 12/19/2019		16			1,430.00 USD	655.30 USD	655.30 USD
Day 12/20/2019							
Totals for Included		13			0.00 USD	0.00 USD	0.00 USD
Totals for Day 12/20/2019		13			0.00 USD	0.00 USD	0.00 USD
Totals for User Name PERACH,AMANDA M (10248833)		53			1,573.00 USD	720.83 USD	720.83 USD
Totals for Client 019438-3		**140**			**3,718.00 USD**	**1,703.79 USD**	**1,703.79 USD**

016940

016940

Account Group: MCW Group
Date Range: January 01, 2020 - January 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 01/12/2020							
Totals for Included		14			751.00 USD	238.15 USD	238.15 USD
Totals for Excluded		1			4.00 USD	0.00 USD	4.00 USD
Totals for Day 01/12/2020		15			755.00 USD	238.15 USD	242.15 USD
Day 01/14/2020							
Totals for Included		9			286.00 USD	90.69 USD	90.69 USD
Totals for Day 01/14/2020		9			286.00 USD	90.69 USD	90.69 USD
Day 01/15/2020							
Totals for Included		7			572.00 USD	181.39 USD	181.39 USD
Totals for Day 01/15/2020		7			572.00 USD	181.39 USD	181.39 USD

Account Group: MCW Group
Date Range: January 01, 2020 - January 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Day 01/18/2020							
Totals for Included		22			1,389.00 USD	440.47 USD	440.47 USD
Totals for Day 01/18/2020		22			1,389.00 USD	440.47 USD	440.47 USD
Day 01/19/2020							
Totals for Included		12			572.00 USD	181.39 USD	181.39 USD
Totals for Day 01/19/2020		12			572.00 USD	181.39 USD	181.39 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		65			3,574.00 USD	1,132.10 USD	1,136.10 USD
User Name PERACH,AMANDA M (10248833)							
Day 01/28/2020							
Totals for Included		14			143.00 USD	45.35 USD	45.35 USD
Totals for Day 01/28/2020		14			143.00 USD	45.35 USD	45.35 USD
Day 01/29/2020							
Totals for Included		27			715.00 USD	226.74 USD	226.74 USD
Totals for Day 01/29/2020		27			715.00 USD	226.74 USD	226.74 USD
Day 01/30/2020							
Totals for Included		15			286.00 USD	90.69 USD	90.69 USD
Totals for Day 01/30/2020		15			286.00 USD	90.69 USD	90.69 USD
Day 01/31/2020							
Totals for Included		18			143.00 USD	45.35 USD	45.35 USD
Totals for Day 01/31/2020		18			143.00 USD	45.35 USD	45.35 USD
Totals for User Name PERACH,AMANDA M (10248833)		74			1,287.00 USD	408.13 USD	408.13 USD
Totals for Client 019438-3		139			4,861.00 USD	1,540.22 USD	1,544.22 USD

016942

016942

Account Group: MCW Group
Date Range: February 01, 2020 - February 29, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 02/01/2020							
Totals for Included		6			286.00 USD	76.28 USD	76.28 USD
Totals for Day 02/01/2020		6			286.00 USD	76.28 USD	76.28 USD
Day 02/02/2020							
Totals for Included		6			0.00 USD	0.00 USD	0.00 USD
Totals for Day 02/02/2020		6			0.00 USD	0.00 USD	0.00 USD
Day 02/03/2020							
Totals for Included		17			715.00 USD	190.70 USD	190.70 USD
Totals for Day 02/03/2020		17			715.00 USD	190.70 USD	190.70 USD
Day 02/13/2020							
Totals for Included		1			0.00 USD	0.00 USD	0.00 USD
Totals for Day 02/13/2020		1			0.00 USD	0.00 USD	0.00 USD
Day 02/18/2020							
Totals for Included		11			143.00 USD	38.14 USD	38.14 USD
Totals for Day 02/18/2020		11			143.00 USD	38.14 USD	38.14 USD
Day 02/27/2020							
Totals for Included		32			1,573.00 USD	419.54 USD	419.54 USD
Totals for Day 02/27/2020		32			1,573.00 USD	419.54 USD	419.54 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		73			2,717.00 USD	724.65 USD	724.65 USD
Totals for Client 019438-3		73			2,717.00 USD	724.65 USD	724.65 USD
[redacted]							

016943

016943

Account Group: MCW Group
Date Range: March 01, 2020 - March 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Totals for Included		7			143.00 USD	48.07 USD	48.07 USD
Totals for Day 03/13/2020		7			143.00 USD	48.07 USD	48.07 USD
Day 03/22/2020							
Totals for Included		33			788.00 USD	264.91 USD	264.91 USD
Totals for Day 03/22/2020		33			788.00 USD	264.91 USD	264.91 USD
Day 03/23/2020							
Totals for Included		47			981.00 USD	329.79 USD	329.79 USD
Totals for Excluded		1			4.00 USD	0.00 USD	4.00 USD
Totals for Day 03/23/2020		48			985.00 USD	329.79 USD	333.79 USD
Day 03/24/2020							
Totals for Included		45			1,001.00 USD	336.52 USD	336.52 USD
Totals for Day 03/24/2020		45			1,001.00 USD	336.52 USD	336.52 USD
Day 03/25/2020							
Totals for Included		23			1,266.00 USD	425.60 USD	425.60 USD
Totals for Day 03/25/2020		23			1,266.00 USD	425.60 USD	425.60 USD
Day 03/26/2020							
Totals for Included		16			0.00 USD	0.00 USD	0.00 USD
Totals for Day 03/26/2020		16			0.00 USD	0.00 USD	0.00 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		172			4,183.00 USD	1,404.90 USD	1,408.90 USD
User Name LUNDVALL,PAT (383221)							
Day 03/31/2020							
Totals for Included		14			1,576.00 USD	529.82 USD	529.82 USD
Totals for Day 03/31/2020		14			1,576.00 USD	529.82 USD	529.82 USD
Totals for User Name LUNDVALL,PAT (383221)		14			1,576.00 USD	529.82 USD	529.82 USD
Totals for Client 019438-3		186			5,759.00 USD	1,934.72 USD	1,938.72 USD

016944
016944

Account Group: MCW Group
Date Range: April 01, 2020 - April 30, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 04/22/2020							
Totals for Included		6			788.00 USD	234.75 USD	234.75 USD
Totals for Day 04/22/2020		6			788.00 USD	234.75 USD	234.75 USD
Day 04/23/2020							
Totals for Included		1			0.00 USD	0.00 USD	0.00 USD
Totals for Day 04/23/2020		1			0.00 USD	0.00 USD	0.00 USD
Day 04/24/2020							
Totals for Included		3			0.00 USD	0.00 USD	0.00 USD
Totals for Day 04/24/2020		3			0.00 USD	0.00 USD	0.00 USD
Day 04/28/2020							
Totals for Included		6			645.00 USD	192.15 USD	192.15 USD
Totals for Day 04/28/2020		6			645.00 USD	192.15 USD	192.15 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		16			1,433.00 USD	426.89 USD	426.89 USD
User Name LUNDVALL,PAT (383221)							
Day 04/13/2020							
Totals for Included		8			715.00 USD	213.00 USD	213.00 USD
Totals for Day 04/13/2020		8			715.00 USD	213.00 USD	213.00 USD
Totals for User Name LUNDVALL,PAT (383221)		8			715.00 USD	213.00 USD	213.00 USD
User Name PERACH,AMANDA M (10248833)							
Day 04/01/2020							
Totals for Included		47			2,346.00 USD	698.88 USD	698.88 USD
Totals for Day 04/01/2020		47			2,346.00 USD	698.88 USD	698.88 USD

016945
016945

Account Group: MCW Group
Date Range: April 01, 2020 - April 30, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Day 04/02/2020							
Totals for Included		14			286.00 USD	85.20 USD	85.20 USD
Totals for Day 04/02/2020		14			286.00 USD	85.20 USD	85.20 USD
Totals for User Name PERACH,AMANDA M (10248833)		61			2,632.00 USD	784.08 USD	784.08 USD
Totals for Client 019438-3		85			4,780.00 USD	1,423.97 USD	1,423.97 USD

016946

016946

Account Group: MCW Group
Date Range: May 01, 2020 - May 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 05/01/2020							
Totals for Included		5			694.00 USD	246.53 USD	246.53 USD
Totals for Day 05/01/2020		5			694.00 USD	246.53 USD	246.53 USD
Day 05/08/2020							
Totals for Included		3			0.00 USD	0.00 USD	0.00 USD
Totals for Day 05/08/2020		3			0.00 USD	0.00 USD	0.00 USD
Day 05/11/2020							
Totals for Included		13			286.00 USD	101.60 USD	101.60 USD
Totals for Day 05/11/2020		13			286.00 USD	101.60 USD	101.60 USD
Day 05/14/2020							
Totals for Included		1			0.00 USD	0.00 USD	0.00 USD
Totals for Day 05/14/2020		1			0.00 USD	0.00 USD	0.00 USD
Day 05/18/2020							
Totals for Included		4			143.00 USD	50.80 USD	50.80 USD
Totals for Day 05/18/2020		4			143.00 USD	50.80 USD	50.80 USD
Day 05/21/2020							
Totals for Included		13			197.00 USD	69.98 USD	69.98 USD
Totals for Day 05/21/2020		13			197.00 USD	69.98 USD	69.98 USD

016947
016947

Account Group: MCW Group
Date Range: May 01, 2020 - May 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Day 05/26/2020							
Totals for Included		3			0.00 USD	0.00 USD	0.00 USD
Totals for Day 05/26/2020		3			0.00 USD	0.00 USD	0.00 USD
Day 05/27/2020							
Totals for Included		19			858.00 USD	304.79 USD	304.79 USD
Totals for Day 05/27/2020		19			858.00 USD	304.79 USD	304.79 USD
Day 05/28/2020							
Totals for Included		2			0.00 USD	0.00 USD	0.00 USD
Totals for Day 05/28/2020		2			0.00 USD	0.00 USD	0.00 USD
Day 05/29/2020							
Totals for Included		9			286.00 USD	101.60 USD	101.60 USD
Totals for Day 05/29/2020		9			286.00 USD	101.60 USD	101.60 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		72			2,464.00 USD	875.29 USD	875.29 USD
User Name LUNDVALL,PAT (383221)							
Day 05/12/2020							
Totals for Included		23			286.00 USD	101.60 USD	101.60 USD
Totals for Day 05/12/2020		23			286.00 USD	101.60 USD	101.60 USD
Day 05/13/2020							
Totals for Included		13			143.00 USD	50.80 USD	50.80 USD
Totals for Day 05/13/2020		13			143.00 USD	50.80 USD	50.80 USD
Totals for User Name LUNDVALL,PAT (383221)		36			429.00 USD	152.39 USD	152.39 USD
User Name PERACH,AMANDA M (10248833)							
Day 05/01/2020							
Totals for Included		5			0.00 USD	0.00 USD	0.00 USD
Totals for Day 05/01/2020		5			0.00 USD	0.00 USD	0.00 USD
Day 05/27/2020							
Totals for Included		1			0.00 USD	0.00 USD	0.00 USD
Totals for Day 05/27/2020		1			0.00 USD	0.00 USD	0.00 USD
Totals for User Name PERACH,AMANDA M (10248833)		6			0.00 USD	0.00 USD	0.00 USD
Totals for Client 019438-3		114			2,893.00 USD	1,027.68 USD	1,027.68 USD

[redacted]

016948
016948

Account Group: MCW Group
Date Range: June 01, 2020 - June 30, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

User Name LUNDVALL,PAT (383221)				
Day 06/04/2020				
Totals for Included	2	0.00 USD	0.00 USD	0.00 USD
Totals for Day 06/04/2020	2	0.00 USD	0.00 USD	0.00 USD
Day 06/09/2020				
Totals for Included	3	0.00 USD	0.00 USD	0.00 USD
Totals for Day 06/09/2020	3	0.00 USD	0.00 USD	0.00 USD
Totals for User Name LUNDVALL,PAT (383221)	5	0.00 USD	0.00 USD	0.00 USD
Totals for Client 019438-3	21	715.00 USD	234.15 USD	234.15 USD

016949

016949

Account Group: MCW Group
Date Range: July 01, 2020 - July 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 07/14/2020							
Totals for Included		24			1,290.00 USD	590.39 USD	590.39 USD
Totals for Day 07/14/2020		24			1,290.00 USD	590.39 USD	590.39 USD
Day 07/15/2020							
Totals for Included		22			715.00 USD	327.23 USD	327.23 USD
Totals for Day 07/15/2020		22			715.00 USD	327.23 USD	327.23 USD
Day 07/16/2020							
Totals for Included		11			1,001.00 USD	458.12 USD	458.12 USD
Totals for Day 07/16/2020		11			1,001.00 USD	458.12 USD	458.12 USD
Day 07/17/2020							
Totals for Included		10			143.00 USD	65.45 USD	65.45 USD
Totals for Day 07/17/2020		10			143.00 USD	65.45 USD	65.45 USD
Day 07/20/2020							
Totals for Included		12			615.00 USD	281.46 USD	281.46 USD
Totals for Excluded		2			126.00 USD	0.00 USD	126.00 USD
Totals for Day 07/20/2020		14			741.00 USD	281.46 USD	407.46 USD
Day 07/21/2020							
Totals for Included		13			837.00 USD	383.07 USD	383.07 USD
Totals for Day 07/21/2020		13			837.00 USD	383.07 USD	383.07 USD
Day 07/23/2020							
Totals for Included		11			572.00 USD	261.79 USD	261.79 USD
Totals for Day 07/23/2020		11			572.00 USD	261.79 USD	261.79 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		105			5,299.00 USD	2,367.51 USD	2,493.51 USD
Totals for Client 019438-3		105			5,299.00 USD	2,367.51 USD	2,493.51 USD
[redacted]							

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Account Group: MCW Group
Date Range: August 01, 2020 - August 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 08/14/2020							
Totals for Included		11			408.00 USD	208.78 USD	208.78 USD
Totals for Day 08/14/2020		11			408.00 USD	208.78 USD	208.78 USD
Day 08/25/2020							
Totals for Included		44			1,768.00 USD	904.72 USD	904.72 USD

Account Group: MCW Group
Date Range: September 01, 2020 - September 30, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Totals for User Name GALLAGHER,KRISTY (4406047)		13			429.00 USD	172.82 USD	172.82 USD

[redacted]

Client 019438-3					
User Name GALLAGHER,KRISTY (4406047)					
Day 09/18/2020					
Totals for Included		11		429.00 USD	172.82 USD	172.82 USD
Totals for Day 09/18/2020		11		429.00 USD	172.82 USD	172.82 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		11		429.00 USD	172.82 USD	172.82 USD
Totals for Client 019438-3		11		429.00 USD	172.82 USD	172.82 USD
Client 019438-3						
User Name GALLAGHER,KRISTY (4406047)						
Day 09/01/2020						
Totals for Included		5		286.00 USD	115.22 USD	115.22 USD
Totals for Day 09/01/2020		5		286.00 USD	115.22 USD	115.22 USD
Day 09/03/2020						
Totals for Included		38		901.00 USD	362.97 USD	362.97 USD
Totals for Day 09/03/2020		38		901.00 USD	362.97 USD	362.97 USD
Day 09/04/2020						
Totals for Included		9		143.00 USD	57.61 USD	57.61 USD

Account Group: MCW Group
Date Range: September 01, 2020 - September 30, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Totals for Client 019438-3		175			7,735.00 USD	3,116.06 USD	3,116.06 USD
Client 019732-2							
User Name WELCH,DIANE (18734747)							
Day 09/24/2020							
Totals for Included		44			1,419.00 USD	571.65 USD	571.65 USD
Totals for Day 09/24/2020		44			1,419.00 USD	571.65 USD	571.65 USD
Totals for User Name WELCH,DIANE (18734747)		44			1,419.00 USD	571.65 USD	571.65 USD
[redacted]							

Account Group: MCW Group
Date Range: October 01, 2020 - October 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 10/05/2020							
Totals for Included		23			715.00 USD	307.14 USD	307.14 USD
Totals for Day 10/05/2020		23			715.00 USD	307.14 USD	307.14 USD
Day 10/06/2020							
Totals for Included		9			143.00 USD	61.43 USD	61.43 USD
Totals for Day 10/06/2020		9			143.00 USD	61.43 USD	61.43 USD
Day 10/07/2020							
Totals for Included		3			265.00 USD	113.84 USD	113.84 USD
Totals for Day 10/07/2020		3			265.00 USD	113.84 USD	113.84 USD

Account Group: MCW Group
Date Range: October 01, 2020 - October 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Day 10/14/2020							
Totals for Included		18			0.00 USD	0.00 USD	0.00 USD
Totals for Day 10/14/2020		18			0.00 USD	0.00 USD	0.00 USD
Totals for User Name YEN,AMANDA (5350973)		105			1,144.00 USD	491.43 USD	491.43 USD
Totals for Client 019438-3		373			5,106.00 USD	2,193.38 USD	2,193.38 USD

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Account Group: MCW Group
Date Range: September 01, 2020 - September 30, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Speci
[redacted]						
Client 019438-3						
User Name GALLAGHER,KRISTY (4406047)						
Day 09/18/2020						
Totals for Included		11			429.00 USD	
Totals for Day 09/18/2020		11			429.00 USD	
Totals for User Name GALLAGHER,KRISTY (4406047)		11			429.00 USD	
Totals for Client 019438-3		11			429.00 USD	
Client 019438-3						
User Name GALLAGHER,KRISTY (4406047)						
Day 09/01/2020						
Totals for Included		5			286.00 USD	
Totals for Day 09/01/2020		5			286.00 USD	
Day 09/03/2020						
Totals for Included		38			901.00 USD	
Totals for Day 09/03/2020		38			901.00 USD	
Day 09/04/2020						
Totals for Included		9			143.00 USD	

Account Group: MCW Group
Date Range: September 01, 2020 - September 30, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Speci
Totals for Day 09/04/2020		9			143.00 USD	
Day 09/08/2020						
Totals for Included		3			0.00 USD	
Totals for Day 09/08/2020		3			0.00 USD	
Day 09/19/2020						
Totals for Included		9			286.00 USD	
Totals for Day 09/19/2020		9			286.00 USD	
Day 09/20/2020						
Totals for Included		38			2,040.00 USD	
Totals for Day 09/20/2020		38			2,040.00 USD	
Day 09/21/2020						
Totals for Included		49			3,005.00 USD	
Totals for Day 09/21/2020		49			3,005.00 USD	
Day 09/22/2020						
Totals for Included		14			931.00 USD	
Totals for Day 09/22/2020		14			931.00 USD	
Totals for User Name GALLAGHER,KRISTY (4406047)		165			7,592.00 USD	
User Name YEN,AMANDA (5350973)						
Day 09/28/2020						
Totals for Included		10			143.00 USD	
Totals for Day 09/28/2020		10			143.00 USD	
Totals for User Name YEN,AMANDA (5350973)		10			143.00 USD	
Totals for Client 019438-3		175			7,735.00 USD	3,

Account Group: MCW Group
Date Range: November 01, 2020 - November 30, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 11/04/2020							
Totals for Included		1			122.00 USD	36.57 USD	36.57 USD
Totals for Day 11/04/2020		1			122.00 USD	36.57 USD	36.57 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		1			122.00 USD	36.57 USD	36.57 USD
Totals for Client 019438-3		1			122.00 USD	36.57 USD	36.57 USD
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 11/01/2020							
Totals for Included		9			429.00 USD	128.60 USD	128.60 USD
Totals for Day 11/01/2020		9			429.00 USD	128.60 USD	128.60 USD
Day 11/02/2020							
Totals for Included		30			143.00 USD	42.87 USD	42.87 USD
Totals for Excluded		1			122.00 USD	0.00 USD	122.00 USD
Totals for Day 11/02/2020		31			265.00 USD	42.87 USD	164.87 USD
Day 11/25/2020							
Totals for Included		1			0.00 USD	0.00 USD	0.00 USD
Totals for Day 11/25/2020		1			0.00 USD	0.00 USD	0.00 USD
Day 11/27/2020							
Totals for Included		21			286.00 USD	85.73 USD	85.73 USD
Totals for Day 11/27/2020		21			286.00 USD	85.73 USD	85.73 USD
Day 11/30/2020							
Totals for Included		18			910.00 USD	272.78 USD	272.78 USD
Totals for Day 11/30/2020		18			910.00 USD	272.78 USD	272.78 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		80			1,890.00 USD	529.98 USD	651.98 USD
Totals for Client 019438-3		80			1,890.00 USD	529.98 USD	651.98 USD
[redacted]							

Account Group: MCW Group
Date Range: December 01, 2020 - December 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 12/01/2020							
Totals for Included		20			652.00 USD	230.25 USD	230.25 USD
Totals for Day 12/01/2020		20			652.00 USD	230.25 USD	230.25 USD
Day 12/03/2020							
Totals for Included		8			286.00 USD	101.00 USD	101.00 USD
Totals for Day 12/03/2020		8			286.00 USD	101.00 USD	101.00 USD
Day 12/04/2020							
Totals for Included		2			143.00 USD	50.50 USD	50.50 USD
Totals for Day 12/04/2020		2			143.00 USD	50.50 USD	50.50 USD
Day 12/16/2020							
Totals for Included		5			143.00 USD	50.50 USD	50.50 USD
Totals for Day 12/16/2020		5			143.00 USD	50.50 USD	50.50 USD
Day 12/17/2020							
Totals for Included		17			652.00 USD	230.25 USD	230.25 USD
Totals for Day 12/17/2020		17			652.00 USD	230.25 USD	230.25 USD
Day 12/18/2020							
Totals for Included		2			0.00 USD	0.00 USD	0.00 USD
Totals for Day 12/18/2020		2			0.00 USD	0.00 USD	0.00 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		54			1,876.00 USD	662.50 USD	662.50 USD
User Name WELCH,DIANE (18734747)							
Day 12/14/2020							

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Account Group: MCW Group
Date Range: December 01, 2020 - December 31, 2020
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Totals for Included		7			572.00 USD	202.00 USD	202.00 USD
Totals for Day 12/14/2020		7			572.00 USD	202.00 USD	202.00 USD
Day 12/28/2020							
Totals for Included		55			2,933.00 USD	1,035.77 USD	1,035.77 USD
Totals for Day 12/28/2020		55			2,933.00 USD	1,035.77 USD	1,035.77 USD
Day 12/29/2020							
Totals for Included		38			1,144.00 USD	404.00 USD	404.00 USD
Totals for Day 12/29/2020		38			1,144.00 USD	404.00 USD	404.00 USD
Day 12/30/2020							
Totals for Included		3			143.00 USD	50.50 USD	50.50 USD
Totals for Day 12/30/2020		3			143.00 USD	50.50 USD	50.50 USD
Totals for User Name WELCH,DIANE (18734747)		103			4,792.00 USD	1,692.26 USD	1,692.26 USD
Totals for Client 019438-3		157			6,668.00 USD	2,354.76 USD	2,354.76 USD

Account Group: MCW Group
Date Range: January 01, 2021 - January 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 01/09/2021							
Totals for Included		22			1,428.00 USD	457.11 USD	457.11 USD
Totals for Day 01/09/2021		22			1,428.00 USD	457.11 USD	457.11 USD
Day 01/20/2021							
Totals for Included		23			1,298.00 USD	415.49 USD	415.49 USD
Totals for Day 01/20/2021		23			1,298.00 USD	415.49 USD	415.49 USD
Day 01/21/2021							

Account Group: MCW Group
Date Range: January 01, 2021 - January 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Totals for Included		5			730.00 USD	233.67 USD	233.67 USD
Totals for Day 01/21/2021		5			730.00 USD	233.67 USD	233.67 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		50			3,456.00 USD	1,106.27 USD	1,106.27 USD
Totals for Client 019438-3		50			3,456.00 USD	1,106.27 USD	1,106.27 USD

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Account Group: MCW Group
Date Range: February 01, 2021 - February 28, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 02/01/2021							
Totals for Included		3			516.00 USD	138.31 USD	138.31 USD
Totals for Day 02/01/2021		3			516.00 USD	138.31 USD	138.31 USD
Day 02/08/2021							
Totals for Included		1			0.00 USD	0.00 USD	0.00 USD
Totals for Day 02/08/2021		1			0.00 USD	0.00 USD	0.00 USD
Day 02/09/2021							
Totals for Included		3			344.00 USD	92.21 USD	92.21 USD
Totals for Day 02/09/2021		3			344.00 USD	92.21 USD	92.21 USD
Day 02/13/2021							
Totals for Included		15			318.00 USD	85.24 USD	85.24 USD
Totals for Day 02/13/2021		15			318.00 USD	85.24 USD	85.24 USD
Day 02/18/2021							
Totals for Included		8			0.00 USD	0.00 USD	0.00 USD
Totals for Day 02/18/2021		8			0.00 USD	0.00 USD	0.00 USD
Day 02/19/2021							
Totals for Included		15			516.00 USD	138.31 USD	138.31 USD
Totals for Day 02/19/2021		15			516.00 USD	138.31 USD	138.31 USD
Day 02/20/2021							
Totals for Included		3			172.00 USD	46.10 USD	46.10 USD
Totals for Day 02/20/2021		3			172.00 USD	46.10 USD	46.10 USD
Day 02/23/2021							
Totals for Included		6			172.00 USD	46.10 USD	46.10 USD
Totals for Day 02/23/2021		6			172.00 USD	46.10 USD	46.10 USD
Day 02/24/2021							
Totals for Included		17			662.00 USD	177.44 USD	177.44 USD
Totals for Day 02/24/2021		17			662.00 USD	177.44 USD	177.44 USD
Day 02/28/2021							
Totals for Included		3			0.00 USD	0.00 USD	0.00 USD
Totals for Day 02/28/2021		3			0.00 USD	0.00 USD	0.00 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		74			2,700.00 USD	723.72 USD	723.72 USD
Totals for Client 019438-3		74			2,700.00 USD	723.72 USD	723.72 USD

[redacted]

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Account Group: MCW Group
Date Range: March 01, 2021 - March 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 03/02/2021							
Totals for Included		7			172.00 USD	50.87 USD	50.87 USD
Totals for Day 03/02/2021		7			172.00 USD	50.87 USD	50.87 USD
Day 03/03/2021							
Totals for Included		37			1,892.00 USD	559.54 USD	559.54 USD
Totals for Day 03/03/2021		37			1,892.00 USD	559.54 USD	559.54 USD
Day 03/04/2021							
Totals for Included		1			146.00 USD	43.18 USD	43.18 USD
Totals for Day 03/04/2021		1			146.00 USD	43.18 USD	43.18 USD
Day 03/10/2021							
Totals for Included		8			344.00 USD	101.73 USD	101.73 USD
Totals for Day 03/10/2021		8			344.00 USD	101.73 USD	101.73 USD
Day 03/15/2021							
Totals for Included		3			318.00 USD	94.05 USD	94.05 USD
Totals for Day 03/15/2021		3			318.00 USD	94.05 USD	94.05 USD

Account Group: MCW Group
Date Range: March 01, 2021 - March 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Day 03/24/2021							
Totals for Included		8			396.00 USD	117.11 USD	117.11 USD
Totals for Excluded		2			10.00 USD	0.00 USD	10.00 USD
Totals for Day 03/24/2021		10			406.00 USD	117.11 USD	127.11 USD
Day 03/25/2021							
Totals for Included		2			0.00 USD	0.00 USD	0.00 USD
Totals for Day 03/25/2021		2			0.00 USD	0.00 USD	0.00 USD
Day 03/26/2021							
Totals for Included		47			3,675.00 USD	1,086.84 USD	1,086.84 USD
Totals for Day 03/26/2021		47			3,675.00 USD	1,086.84 USD	1,086.84 USD
Day 03/27/2021							
Totals for Included		4			0.00 USD	0.00 USD	0.00 USD
Totals for Day 03/27/2021		4			0.00 USD	0.00 USD	0.00 USD
Day 03/30/2021							
Totals for Included		8			516.00 USD	152.60 USD	152.60 USD
Totals for Day 03/30/2021		8			516.00 USD	152.60 USD	152.60 USD
Day 03/31/2021							
Totals for Included		14			834.00 USD	246.65 USD	246.65 USD
Totals for Day 03/31/2021		14			834.00 USD	246.65 USD	246.65 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		141			8,303.00 USD	2,452.57 USD	2,462.57 USD
Totals for Client 019438-3		141			8,303.00 USD	2,452.57 USD	2,462.57 USD

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Account Group: MCW Group
Date Range: April 01, 2021 - April 30, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 04/03/2021							
Totals for Included		12			1,689.00 USD	452.72 USD	452.72 USD
Totals for Excluded		1			5.00 USD	0.00 USD	5.00 USD
Totals for Day 04/03/2021		13			1,694.00 USD	452.72 USD	457.72 USD
Day 04/05/2021							
Totals for Included		10			860.00 USD	230.52 USD	230.52 USD
Totals for Day 04/05/2021		10			860.00 USD	230.52 USD	230.52 USD
Day 04/08/2021							
Totals for Included		6			516.00 USD	138.31 USD	138.31 USD
Totals for Day 04/08/2021		6			516.00 USD	138.31 USD	138.31 USD
Day 04/09/2021							

Account Group: MCW Group
Date Range: April 01, 2021 - April 30, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
Totals for User Name LUNDVALL,PAT (383221)		33			2,414.00 USD	647.06 USD	647.06 USD
Totals for Client 019438-3		154			13,093.00 USD	3,508.15 USD	3,513.15 USD
Client 019908-5							
User Name GALLAGHER,KRISTY (4406047)							
Day 04/24/2021							
Totals for Included		1			172.00 USD	46.10 USD	46.10 USD
Totals for Day 04/24/2021		1			172.00 USD	46.10 USD	46.10 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		1			172.00 USD	46.10 USD	46.10 USD

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Account Group: MCW Group
Date Range: May 01, 2021 - May 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 05/03/2021							
Totals for Included		16			2,560.00 USD	562.85 USD	562.85 USD
Totals for Day 05/03/2021		16			2,560.00 USD	562.85 USD	562.85 USD
Day 05/04/2021							
Totals for Included		19			2,379.00 USD	523.06 USD	523.06 USD
Totals for Day 05/04/2021		19			2,379.00 USD	523.06 USD	523.06 USD
Day 05/10/2021							
Totals for Included		14			2,056.00 USD	452.04 USD	452.04 USD
Totals for Day 05/10/2021		14			2,056.00 USD	452.04 USD	452.04 USD
Day 05/12/2021							
Totals for Included		14			1,044.00 USD	229.54 USD	229.54 USD
Totals for Day 05/12/2021		14			1,044.00 USD	229.54 USD	229.54 USD
Day 05/13/2021							
Totals for Included		4			104.00 USD	22.87 USD	22.87 USD
Totals for Day 05/13/2021		4			104.00 USD	22.87 USD	22.87 USD
Day 05/18/2021							
Totals for Included		7			516.00 USD	113.45 USD	113.45 USD
Totals for Day 05/18/2021		7			516.00 USD	113.45 USD	113.45 USD
Day 05/19/2021							
Totals for Included		6			0.00 USD	0.00 USD	0.00 USD
Totals for Day 05/19/2021		6			0.00 USD	0.00 USD	0.00 USD
Day 05/20/2021							
Totals for Included		6			224.00 USD	49.25 USD	49.25 USD
Totals for Day 05/20/2021		6			224.00 USD	49.25 USD	49.25 USD
Day 05/23/2021							
Totals for Included		12			344.00 USD	75.63 USD	75.63 USD
Totals for Day 05/23/2021		12			344.00 USD	75.63 USD	75.63 USD
Day 05/25/2021							
Totals for Included		16			1,292.00 USD	284.06 USD	284.06 USD
Totals for Day 05/25/2021		16			1,292.00 USD	284.06 USD	284.06 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		114			10,519.00 USD	2,312.74 USD	2,312.74 USD
Totals for Client 019438-3		114			10,519.00 USD	2,312.74 USD	2,312.74 USD
[redacted]							

016968

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Account Group: MCW Group
Date Range: June 01, 2021 - June 30, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge	Total Charge
[redacted]							
Client 019438-3							
User Name GALLAGHER,KRISTY (4406047)							
Day 06/06/2021							
Totals for Included		15			344.00 USD	82.96 USD	82.96 USD
Totals for Day 06/06/2021		15			344.00 USD	82.96 USD	82.96 USD
Day 06/14/2021							
Totals for Included		3			172.00 USD	41.48 USD	41.48 USD
Totals for Day 06/14/2021		3			172.00 USD	41.48 USD	41.48 USD
Day 06/18/2021							
Totals for Included		5			464.00 USD	111.91 USD	111.91 USD

Account Group: MCW Group
Date Range: July 01, 2021 - July 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge	Special Pricing Charge
[redacted]						
Client 019438-3						
User Name LATINO,CHELSEA (16514414)						
Day 07/01/2021						
Totals for Included		5			860.00 USD	188.56 USD
Totals for Day 07/01/2021		5			860.00 USD	188.56 USD
Totals for User Name LATINO,CHELSEA (16514414)		5			860.00 USD	188.56 USD
Totals for Client 019438-3		5			860.00 USD	188.56 USD 18

016970

[redacted]

Account Group: MCW Group
Date Range: August 01, 2021 - August 31, 2021
Report Format: Summary-Account by Client by User by Day

[redacted]

Client 019438-3				
User Name GALLAGHER,KRISTY (4406047)				
Day 08/04/2021				
Totals for Included	6	422.00 USD	88.85 USD	88.85 USD
Totals for Day 08/04/2021	6	422.00 USD	88.85 USD	88.85 USD
Day 08/06/2021				
Totals for Included	14	344.00 USD	72.42 USD	72.42 USD
Totals for Day 08/06/2021	14	344.00 USD	72.42 USD	72.42 USD
Day 08/13/2021				
Totals for Included	15	1,032.00 USD	217.27 USD	217.27 USD
Totals for Day 08/13/2021	15	1,032.00 USD	217.27 USD	217.27 USD
Totals for User Name GALLAGHER,KRISTY (4406047)	35	1,798.00 USD	378.55 USD	378.55 USD
Totals for Client 019438-3	**35**	**1,798.00 USD**	**378.55 USD**	**378.55 USD**

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[redacted]

016971

Account Group: MCW Group
Date Range: September 01, 2021 - September 30, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Standard Charge	Special Pricing Charge	Total Charge
[redacted]			
Client 019438-3			
User Name GALLAGHER,KRISTY (4406047)			
Day 09/08/2021			
Totals for Included	516.00 USD	102.20 USD	102.20 USD
Totals for Day 09/08/2021	516.00 USD	102.20 USD	102.20 USD
Day 09/14/2021			
Totals for Included	1,204.00 USD	238.48 USD	238.48 USD
Totals for Day 09/14/2021	1,204.00 USD	238.48 USD	238.48 USD
Day 09/15/2021			
Totals for Included	172.00 USD	34.07 USD	34.07 USD
Totals for Day 09/15/2021	172.00 USD	34.07 USD	34.07 USD
Day 09/16/2021			
Totals for Included	172.00 USD	34.07 USD	34.07 USD
Totals for Day 09/16/2021	172.00 USD	34.07 USD	34.07 USD
Day 09/20/2021			
Totals for Included	172.00 USD	34.07 USD	34.07 USD
Totals for Day 09/20/2021	172.00 USD	34.07 USD	34.07 USD
Day 09/27/2021			
Totals for Included	0.00 USD	0.00 USD	0.00 USD
Totals for Day 09/27/2021	0.00 USD	0.00 USD	0.00 USD
Day 09/28/2021			
Totals for Included	0.00 USD	0.00 USD	0.00 USD
Totals for Day 09/28/2021	0.00 USD	0.00 USD	0.00 USD
Totals for User Name GALLAGHER,KRISTY (4406047)	2,236.00 USD	442.88 USD	442.88 USD
User Name LUNDVALL,PAT (383221)			
Day 09/17/2021			
Totals for Included	1,892.00 USD	374.75 USD	374.75 USD
Totals for Day 09/17/2021	1,892.00 USD	374.75 USD	374.75 USD
Day 09/19/2021			
Totals for Included	344.00 USD	68.14 USD	68.14 USD
Totals for Day 09/19/2021	344.00 USD	68.14 USD	68.14 USD

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Account Group: MCW Group
Date Range: September 01, 2021 - September 30, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Standard Charge	Special Pricing Charge	Total Charge
Day 09/20/2021			
Totals for Included	1,720.00 USD	340.68 USD	340.68 USD
Totals for Day 09/20/2021	1,720.00 USD	340.68 USD	340.68 USD
Day 09/21/2021			
Totals for Included	0.00 USD	0.00 USD	0.00 USD
Totals for Day 09/21/2021	0.00 USD	0.00 USD	0.00 USD
Totals for User Name LUNDVALL,PAT (383221)	3,956.00 USD	783.56 USD	783.56 USD
User Name PERACH,AMANDA M (10248833)			
Day 09/03/2021			
Totals for Included	925.00 USD	183.21 USD	183.21 USD
Totals for Day 09/03/2021	925.00 USD	183.21 USD	183.21 USD
Day 09/15/2021			
Totals for Included	0.00 USD	0.00 USD	0.00 USD
Totals for Day 09/15/2021	0.00 USD	0.00 USD	0.00 USD
Day 09/28/2021			
Totals for Included	172.00 USD	34.07 USD	34.07 USD
Totals for Day 09/28/2021	172.00 USD	34.07 USD	34.07 USD
Totals for User Name PERACH,AMANDA M (10248833)	1,097.00 USD	217.28 USD	217.28 USD
Totals for Client 019438-3	**7,289.00 USD**	**1,443.73 USD**	**1,443.73 USD**

016973

016973

Account Group: MCW Group
Date Range: October 01, 2021 - October 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

016974

016974

Client 019438-3

Account Group: MCW Group
Date Range: October 01, 2021 - October 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Day 10/05/2021				
Totals for Included	1	0.00 USD	0.00 USD	0.00 USD
Totals for Day 10/05/2021	1	0.00 USD	0.00 USD	0.00 USD
Day 10/20/2021				
Totals for Included	4	344.00 USD	56.49 USD	56.49 USD
Totals for Day 10/20/2021	4	344.00 USD	56.49 USD	56.49 USD
Day 10/28/2021				
Totals for Included	3	172.00 USD	28.24 USD	28.24 USD
Totals for Day 10/28/2021	3	172.00 USD	28.24 USD	28.24 USD
Totals for User Name PERACH,AMANDA M (10248833)	8	516.00 USD	84.73 USD	84.73 USD
User Name YEN,AMANDA (5350973)				
Day 10/15/2021				
Totals for Included	5	0.00 USD	0.00 USD	0.00 USD
Totals for Day 10/15/2021	5	0.00 USD	0.00 USD	0.00 USD
Day 10/18/2021				
Totals for Included	66	860.00 USD	141.22 USD	141.22 USD
Totals for Day 10/18/2021	66	860.00 USD	141.22 USD	141.22 USD
Day 10/19/2021				
Totals for Included	4	0.00 USD	0.00 USD	0.00 USD
Totals for Day 10/19/2021	4	0.00 USD	0.00 USD	0.00 USD
Day 10/20/2021				
Totals for Included	12	860.00 USD	141.22 USD	141.22 USD
Totals for Day 10/20/2021	12	860.00 USD	141.22 USD	141.22 USD
Totals for User Name YEN,AMANDA (5350973)	87	1,720.00 USD	282.45 USD	282.45 USD
Totals for Client 019438-3	**231**	**13,353.00 USD**	**2,192.73 USD**	**2,192.73 USD**

016975

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Account Group: MCW Group
Date Range: November 01, 2021 - November 30, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Totals for Day 11/01/2021	19	490.00 USD
Day 11/02/2021		
Totals for Included	29	1,119.00 USD
Totals for Day 11/02/2021	29	1,119.00 USD
Day 11/03/2021		
Totals for Included	3	172.00 USD
Totals for Day 11/03/2021	3	172.00 USD
Day 11/08/2021		
Totals for Included	26	1,896.00 USD
Totals for Day 11/08/2021	26	1,896.00 USD
Day 11/09/2021		
Totals for Included	21	662.00 USD
Totals for Day 11/09/2021	21	662.00 USD
Day 11/10/2021		
Totals for Included	79	1,548.00 USD
Totals for Day 11/10/2021	79	1,548.00 USD
Day 11/11/2021		
Totals for Included	14	490.00 USD
Totals for Day 11/11/2021	14	490.00 USD
Day 11/12/2021		
Totals for Included	3	464.00 USD
Totals for Day 11/12/2021	3	464.00 USD
Day 11/13/2021		
Totals for Included	64	5,234.00 USD
Totals for Excluded	2	292.00 USD
Totals for Day 11/13/2021	66	5,526.00 USD
Day 11/14/2021		
Totals for Included	7	172.00 USD
Totals for Day 11/14/2021	7	172.00 USD
Day 11/16/2021		
Totals for Included	5	490.00 USD
Totals for Day 11/16/2021	5	490.00 USD
Day 11/18/2021		
Totals for Included	11	1,074.00 USD
Totals for Day 11/18/2021	11	1,074.00 USD
Day 11/21/2021		
Totals for Included	24	2,134.00 USD
Totals for Day 11/21/2021	24	2,134.00 USD
Totals for User Name GALLAGHER,KRISTY (4406047)	307	16,237.00 USD
User Name PERACH,AMANDA M (10248833)		
Day 11/03/2021		
Totals for Included	6	834.00 USD
Totals for Day 11/03/2021	6	834.00 USD
Day 11/09/2021		
Totals for Included	3	0.00 USD
Totals for Day 11/09/2021	3	0.00 USD
Day 11/10/2021		
Totals for Included	18	0.00 USD
Totals for Day 11/10/2021	18	0.00 USD
Day 11/11/2021		
Totals for Included	74	1,178.00 USD
Totals for Day 11/11/2021	74	1,178.00 USD
Day 11/12/2021		
Totals for Included	53	1,178.00 USD
Totals for Day 11/12/2021	53	1,178.00 USD
Day 11/13/2021		
Totals for Included	15	516.00 USD
Totals for Day 11/13/2021	15	516.00 USD
Day 11/14/2021		
Totals for Included	25	1,934.00 USD
Totals for Day 11/14/2021	25	1,934.00 USD
Day 11/18/2021		
Totals for Included	32	808.00 USD
Totals for Day 11/18/2021	32	808.00 USD
Totals for User Name PERACH,AMANDA M (10248833)	226	6,448.00 USD
Totals for Client 019438-3	**533**	**22,685.00 USD**

Account Group: MCW Group
Date Range: December 01, 2021 - December 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge
[redacted]					
[redacted]					
Client 019438-3					
User Name GALLAGHER,KRISTY (4406047)					
Day 12/06/2021					
Totals for Included		21			1,418.00 USD
Totals for Day 12/06/2021		21			1,418.00 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		21			1,418.00 USD

Account Group: MCW Group
Date Range: December 01, 2021 - December 31, 2021
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, Westlaw Retired
Content Families: All Content Families

Account by Client by User by Day	Database Time	Transactions	Docs/Lines	Connect Time	Standard Charge
Totals for Client 019438-3		21			1,418.00 USD
Client 019438-3					
User Name GALLAGHER,KRISTY (4406047)					
Day 12/28/2021					
Totals for Included		6			0.00 USD
Totals for Day 12/28/2021		6			0.00 USD
Day 12/29/2021					
Totals for Included		21			5,265.00 USD
Totals for Day 12/29/2021		21			5,265.00 USD
Day 12/30/2021					
Totals for Included		14			688.00 USD
Totals for Day 12/30/2021		14			688.00 USD
Totals for User Name GALLAGHER,KRISTY (4406047)		41			5,953.00 USD
User Name PERACH,AMANDA M (10248833)					
Day 12/15/2021					
Totals for Included		6			0.00 USD
Totals for Day 12/15/2021		6			0.00 USD
Day 12/16/2021					
Totals for Included		12			0.00 USD
Totals for Day 12/16/2021		12			0.00 USD
Day 12/17/2021					
Totals for Included		36			0.00 USD
Totals for Day 12/17/2021		36			0.00 USD
Day 12/18/2021					
Totals for Included		3			318.00 USD
Totals for Day 12/18/2021		3			318.00 USD
Totals for User Name PERACH,AMANDA M (10248833)		57			318.00 USD
Totals for Client 019438-3		98			6,271.00 USD

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EXHIBIT F

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PACER
Public Access to Court Electronic Records

INVOICE

Invoice Date: 04/06/2020
Usage From: 01/01/2020 to: 03/31/2020

Account Summary

Pages:	19,472
Rate:	$0.10
Subtotal:	$1,947.20
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$1,947.20
Previous Balance:	$0.00
Current Balance:	**$1,947.20**

Account #:	2594074
Invoice #:	2594074-Q12020
Due Date:	05/11/2020
Amount Due:	$1,947.20

Total Amount Due: → $1,947.20

Coming Soon: New PACER Website

A new pacer.gov website has been designed and developed to offer easier access to PACER and PACER-related applications. It also contains a library of common questions and additional information about PACER and electronic public access services.

The new site:
* Is mobile-friendly.
* Groups court-specific information all in one place.
* Provides an interactive way to find frequently asked questions.
* Features new accessibility tools.

The final phase of the pacer.gov project begins this month, with the goal of launching in June.

Contact Us

San Antonio: (210) 301-6440
Toll Free: (800) 676-6856
Hours: 8 am - 6 pm CT M-F
pacer@psc.uscourts.gov

See pacer.gov/billing for detailed billing transactions, instructions for disputing transactions, FAQs, and more.

It's quick and easy to pay your bill online with a credit card. Visit the **Manage My Account** section of the PACER Service Center website at pacer.gov.

The PACER Federal Tax ID is:
74-2747938

Questions about the invoice?
Visit **pacer.gov/billing**

Please detach the coupon below and return with your payment. ***Thank you!***

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Account #	Due Date	Amount Due
2594074	05/11/2020	$1,947.20

Do not send cash. Make checks or money orders drawn on a U.S. Bank in U.S. dollars payable to: PACER Service Center. Include your account ID on the check or money order.

Visit pacer.gov for address changes.

Mcdonald Carano Wilson Mccune Bergin Fra
Mcw Mcw
PO Box 2670
Reno, NV 89505-2670

U.S. Courts: PACER
P.O. Box 5208
Portland, OR 97208-5208

016980
016980

BillingHistorylv0753ng.txt

PACER Service Center
Billing History Report
Wed, Apr 15 12:25:44 2020
User: lv0753ng

Summary Transaction Report by Client Code
All
from 01/01/2020 to 03/31/2020

Client Code	Pages	Audio	Cost
[redacted]			
19438-3	59	0	$5.90
[redacted]			

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PACER
Public Access to Court Electronic Records

INVOICE

Invoice Date: 07/08/2019
Usage From: 04/01/2019 to: 06/30/2019

Account Summary

Pages:	8,306
Rate:	$0.10
Subtotal:	$830.60
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$830.60
Previous Balance:	$0.00
Current Balance:	**$830.60**

Account #:	2594074
Invoice #:	2594074-Q22019
Due Date:	08/09/2019
Amount Due:	$830.60

Total Amount Due: → $830.60

Eight More Courts Convert to NextGen CM/ECF

During the second quarter of 2019, eight more courts implemented the next generation case management/electronic case files (NextGen CM/ECF) system. To date, 53 courts have converted, and more will follow in the coming months. For more information and updates on NextGen conversion, please continue to check your court's website. Below is a list of the most recent NextGen courts:

- Wisconsin Eastern District Court
- Georgia Northern District Court
- North Carolina Eastern Bankruptcy Court
- Georgia Middle District Court
- Missouri Eastern District Court
- Indiana Northern Bankruptcy Court
- Colorado Bankruptcy Court
- New York Western Bankruptcy Court

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74-2747938

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Account #	Due Date	Amount Due
2594074	08/09/2019	$830.60

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Mcw Mcw
PO Box 2670
Reno, NV 89505-2670

U.S. Courts: PACER
P.O. Box 5208
Portland, OR 97208-5208

016982

BillingHistorylv0753ng.txt

PACER Service Center
Billing History Report
Tue, Jul 16 17:30:22 2019
User: lv0753ng

Summary Transaction Report by Client Code
All
from 04/01/2019 to 06/30/2019

Client Code	Pages	Audio	Cost
[redacted]			
019438-3	38	0	$3.80
[redacted]			
19438-3	324	0	$32.40
[redacted]			

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RECEIVED
OCT 14 2019
MC LLP - Accounting Dept.

POSTED
VOUCHER # _____
PAY DATE _____

PACER
Public Access to Court Electronic Records

INVOICE

Invoice Date: 10/07/2019
Usage From: 07/01/2019 to: 09/30/2019

Account Summary

Pages:	8,155
Rate:	$0.10
Subtotal:	$815.50
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$815.50
Previous Balance:	$0.00
Current Balance:	**$815.50**

Account #:	2594074
Invoice #:	2594074-Q32019
Due Date:	11/12/2019
Amount Due:	$815.50

Total Amount Due: → $815.50

Seven More Courts Convert to NextGen CM/ECF

During the third quarter of 2019, seven more courts implemented the next generation case management/electronic case files (NextGen CM/ECF) system. To date, 60 courts have converted, and more will follow in the coming months. For more information and updates on NextGen conversion, please continue to check your court's website. Below is a list of the most recent NextGen courts:

- Guam Bankruptcy Court
- Michigan Western District Court
- Missouri Eastern Bankruptcy Court
- New Mexico Bankruptcy Court
- Oklahoma Eastern District Court
- Oklahoma Northern District Court
- U.S. Court of Federal Claims

Contact Us

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The PACER Federal Tax ID is:
74-2747938

Questions about the invoice?
Visit **pacer.gov/billing**

Please detach the coupon below and return with your payment. ***Thank you!***

PACER
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Account #	Due Date	Amount Due
2594074	11/12/2019	$815.50

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Mcdonald Carano Wilson Mccune Bergin Fra
Mcw Mcw
PO Box 2670
Reno, NV 89505-2670

U.S. Courts: PACER
P.O. Box 5208
Portland, OR 97208-5208

016984

016984

BillingHistorylv0753ng.txt

PACER Service Center
Billing History Report
Mon, Oct 14 10:36:21 2019
User: lv0753ng

Summary Transaction Report by Client Code
All
from 07/01/2019 to 09/30/2019

Client Code	Pages	Audio	Cost
[redacted]			
19438-3	33	0	$3.30
[redacted]			

016985

016985

016985

PACER
Public Access to Court Electronic Records

INVOICE

Invoice Date: 01/07/2020
Usage From: 10/01/2019 to: 12/31/2019

Account Summary

Pages:	9,623
Rate:	$0.10
Subtotal:	$962.30
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$962.30
Previous Balance:	$0.00
Current Balance:	**$962.30**

Account #:	2594074
Invoice #:	2594074-Q42019
Due Date:	02/10/2020
Amount Due:	$962.30

Total Amount Due: → $962.30

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The PACER Federal Tax ID is:
74-2747938

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PACER Users Gain More Free Access in 2020

As of January 1, PACER usage fees are waived if they total $30 or less. The April 2020 billing statement will reflect the new waiver.

This is an increase from the previous $15 or less per quarter, and it will result in more than 75 percent of users paying no quarterly fee.

To learn more about PACER fees, check the electronic public access fee schedule on the Resources page at pacer.gov.

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Please detach the coupon below and return with your payment. ***Thank you!***

PACER
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Account #	Due Date	Amount Due
2594074	02/10/2020	$962.30

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BillingHistorylv0753ng.txt

PACER Service Center
Billing History Report
Wed, Jan 15 12:58:36 2020
User: lv0753ng

Summary Transaction Report by Client Code
All
from 10/01/2019 to 12/31/2019

Client Code	Pages	Audio	Cost
[redacted]			
19438-3	72	0	$7.20
[redacted]			

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30470-1	37	0	$3.70
30487-1	29	0	$2.90
30556-1	25	0	$2.50
30626-1	70	0	$7.00
30631-1	25	0	$2.50
30636-1	104	0	$10.40
30685-1	3	0	$0.30
30730-1	51	0	$5.10
30767-1	14	0	$1.40
30781-1	262	0	$26.20
6325-5	37	0	$3.70
8999-1	43	0	$4.30
9579-1	44	0	$4.40
9758-7	9	0	$0.90
9759-1 TW	33	0	$3.30
9760-413	128	0	$12.80
30767-1	254	0	$25.40
30781-1	480	0	$48.00
99-1	4	0	$0.40
999-1	978	0	$97.80
999-4	12	0	$1.20
9999-1	2130	0	$213.00
9999-1.	2	0	$0.20
99999-1	1051	0	$105.10
30805-1	20	0	$2.00
99999-4	28	0	$2.80
999999-1	905	0	$90.50

Grand Total	9623 pages	$962.30
	0 audio files ($ 2.40 ea)	$0.00

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INVOICE

Invoice Date: 04/06/2020
Usage From: 01/01/2020 to: 03/31/2020

Account Summary

Pages:	19,472
Rate:	$0.10
Subtotal:	$1,947.20
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$1,947.20
Previous Balance:	$0.00
Current Balance:	**$1,947.20**

Account #:	2594074
Invoice #:	2594074-Q12020
Due Date:	05/11/2020
Amount Due:	$1,947.20

Total Amount Due: $1,947.20

Coming Soon: New PACER Website

A new pacer.gov website has been designed and developed to offer easier access to PACER and PACER-related applications. It also contains a library of common questions and additional information about PACER and electronic public access services.

The new site:
* Is mobile-friendly.
* Groups court-specific information all in one place.
* Provides an interactive way to find frequently asked questions.
* Features new accessibility tools.

The final phase of the pacer.gov project begins this month, with the goal of launching in June.

Contact Us

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Account #	Due Date	Amount Due
2594074	05/11/2020	$1,947.20

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115
0823

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BillingHistorylv0753ng.txt

PACER Service Center
Billing History Report
Wed, Apr 15 12:25:44 2020
User: lv0753ng

Summary Transaction Report by Client Code
All
from 01/01/2020 to 03/31/2020

Client Code	Pages	Audio	Cost
[redacted]			
19438-3	59	0	$5.90
[redacted]			
19784-3	45	0	$4.50
[redacted]			

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AUG 11 2020
MC LLP - Accounting Dept.

POSTED
VOUCHER # _____
PAY DATE _____

PACER
Public Access to Court Electronic Records

INVOICE

Invoice Date: 07/07/2020
Usage From: 04/01/2020 to: 06/30/2020

Account Summary

Pages:	7,061
Rate:	$0.10
Subtotal:	$706.10
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$706.10
Previous Balance:	$0.00
Current Balance:	**$706.10**

Account #:	2594074
Invoice #:	2594074-Q22020
Due Date:	08/10/2020
Amount Due:	$706.10

Total Amount Due: → $706.10

New PACER Website Launches

The fully updated and redesigned PACER website launched in June, and it offers several new features to improve the user experience. The new site provides easier access to PACER and PACER-related applications.

The PACER website:
* Is mobile-friendly.
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Visit https://pacer.uscourts.gov to check out the new design, and to sign up for PACER announcements and other email updates.

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Account #	Due Date	Amount Due
2594074	08/10/2020	$706.10

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BillingHistorylv0753ng.txt

PACER Service Center
Billing History Report
Tue, Aug 4 15:06:33 2020
User: lv0753ng

Summary Transaction Report by Client Code
All
from 04/01/2020 to 06/30/2020

Client Code	Pages	Audio	Cost
019438-3	70	0	$7.00

[redacted]

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OCT 12 2020
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INVOICE

Invoice Date: 10/07/2020
Usage From: 07/01/2020 to: 09/30/2020

Account Summary

POSTED
VOUCHER # _____
PAY DATE _____

Pages:	10,164
Rate:	$0.10
Subtotal:	$1,016.40
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$1,016.40
Previous Balance:	$0.00
Current Balance:	**$1,016.40**

$554.70 office

Account #:	2594074
Invoice #:	2594074-Q32020
Due Date:	11/10/2020
Amount Due:	$1,016.40

Total Amount Due: → $1,016.40

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Account #	Due Date	Amount Due
2594074	11/10/2020	$1,016.40

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BillingHistorylv0753ng.txt

PACER Service Center
Billing History Report
Mon, Oct 12 15:42:00 2020
User: lv0753ng

Summary Transaction Report by Client Code
All
from 07/01/2020 to 09/30/2020

Client Code	Pages	Audio	Cost
[redacted]			
19438-3	113	0	$11.30
[redacted]			

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Public Access to Court Electronic Records

INVOICE

Invoice Date: 01/06/2021

Usage From: 10/01/2020 to: 12/31/2020

Account Summary

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FEB 01 2021
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Pages:	6,811
Rate:	$0.10
Subtotal:	$681.10
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$681.10
Previous Balance:	$0.00
Current Balance:	**$681.10**

Account #:	2594074
Invoice #:	2594074-Q42020
Due Date:	02/10/2021
Amount Due:	$681.10

Total Amount Due: $681.10

Five Courts Convert to NextGen in Q4

In the fourth quarter, five courts implemented the next generation case management/electronic case files (NextGen CM/ECF) system:

* Michigan Western Bankruptcy
* Ohio Southern District
* Texas Western Bankruptcy
* Virginia Western District
* Wyoming District

Continue to check your court's website for more information on when it will convert to NextGen.

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Account #	Due Date	Amount Due
2594074	02/10/2021	$681.10

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Oct-Dec BillingHistorylv0753ng.txt

PACER Service Center
Billing History Report
Mon, Feb 1 15:21:28 2021
User: lv0753ng

Summary Transaction Report by Client Code
All
from 10/01/2020 to 12/31/2020

Client Code	Pages	Audio	Cost
[redacted]			
19438-3	289	0	$28.90
[redacted]			

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Public Access to Court Electronic Records

INVOICE

Invoice Date: 04/07/2021
Usage From: 01/01/2021 to: 03/31/2021

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APR 19 2021
MC LLP - Accounting Dept.

Account Summary

Pages:	5,897
Rate:	$0.10
Subtotal:	$589.70
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$589.70
Previous Balance:	$0.00
Current Balance:	**$589.70**

Total Amount Due: $589.70

Account #:	2594074
Invoice #:	2594074-Q12021
Due Date:	05/10/2021
Amount Due:	$589.70

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Eight Courts Convert to NextGen in Q1

In the first quarter, eight courts implemented the next generation case management/electronic case files (NextGen CM/ECF) system:
* California Northern Bankruptcy
* Delaware Bankruptcy
* Kentucky Eastern Bankruptcy
* Mississippi Northern District
* New York Eastern Bankruptcy
* Tennessee Western Bankruptcy
* Washington Eastern District
* Wisconsin Eastern Bankruptcy

Continue to check your court's website for more information on when it will convert to NextGen.

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Account #	Due Date	Amount Due
2594074	05/10/2021	$589.70

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123
0831

BillingHistorylv0753ng.txt

PACER Service Center
Billing History Report
Mon, Apr 19 11:41:05 2021
User: lv0753ng

Summary Transaction Report by Client Code
All
from 01/01/2021 to 03/31/2021

Client Code	Pages	Audio	Cost
[redacted]			
19438-3	731	0	$73.10
[redacted]			

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INVOICE

Invoice Date: 07/08/2021
Usage From: 04/01/2021 to: 06/30/2021

Account Summary

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AUG 17 2021
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Pages:	3,506
Rate:	$0.10
Subtotal:	$350.60
Audio Files:	0
Rate:	$2.40
Subtotal:	$0.00
Current Billed Usage:	$350.60
Previous Balance:	$0.00
Current Balance:	**$350.60**

VOUCHER # 262497
PAY DATE

Account #:	2594074
Invoice #:	2594074-Q22021
Due Date:	08/10/2021
Amount Due:	$350.60

Total Amount Due: $350.60

14 Courts Convert to NextGen in Q2

In the second quarter, 14 courts implemented the next generation case management/electronic case files (NextGen CM/ECF) system:

* Alabama Middle District
* California Central Bankruptcy
* Florida Middle District
* Illinois Central District
* Illinois Northern Bankruptcy
* JPML
* Maryland Bankruptcy
* Michigan Eastern Bankruptcy
* New York Bankruptcy
* Oklahoma Eastern Bankruptcy
* South Dakota District
* Utah Bankruptcy
* Vermont District
* Virginia Eastern District

Continue to check your court's website for more information on when it will convert to NextGen.

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PACER
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Account #	Due Date	Amount Due
2594074	08/10/2021	$350.60

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PACER Service Center
Billing History Report
Thu, Aug 12 16:59:07 2021
User: lv0753ng

Summary Transaction Report by Client Code
All
from 04/01/2021 to 06/30/2021

Client Code	Pages	Audio	Cost
[redacted]			
19438-3	12	0	$1.20
[redacted]			

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