IN THE SUPREME COURT OF THE STATE OF NEVADA

LYNITA SUE NELSON. INDIVIDUALLY, AND CAPACITY AS INV **INVESTMENT** TRUSTEE OF THE LYNITA S. NELSON NEVADA TRUST DATED MAY 30, 2001, Appellants/Cross-Respondents, MATT KLABACKA DISTRIBUTION TRUSTEE OF THE ERIC L. NELSON NEVADA TRUST DATED MAY 30, 2001; AND ERIC L. NELSON, Respondents/Cross-Appellant. ERIC L. NELSON, Respondent.

SUPREME COURT CASE NO.: 87234

District Court Case NElebttoths ally Filed Feb 13 2024 01:37 PM Elizabeth A. Brown Clerk of Supreme Court

APPENDIX TO APPELLANT, LYNITA NELSON'S OPENING BRIEF

VOLUME 10

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Attorneys for Appellant, Lynita Nelson, Individually and as Trustee of the Lynita S. Nelson Nevada Trust Dated May 30, 2001

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CERTIFICATE OF SERVICE

Pursuant to Nevada Rule of Civil Procedure 5(b) and NEFCR 9, the undersigned hereby certifies that on February 13, 2024, a copy of the **APPENDIX TO APPELLANT, LYNITA NELSON'S OPENING BRIEF VOLUME 10** was filed with the Clerk of the Court through the Court's eFlex electronic filing system and notice will be sent electronically by the Court to the following:

Jeffrey P. Luszeck, Esq. SOLOMON DWIGGINS FREER & STEADMAN, LTD. 9060 West Cheyenne Avenue Las Vegas, NV 89129 Tel: (702) 853-5483 Fax: (702) 853-5485 iluszeck@sdfnvlaw.com Attornevs for Matt Klabacka. Distribution Trustee of the ERIC L. NELSON *NEVADA* TRUST dated May 30, 2001

Michelle A. Hauser, Esq.
Hauser Family Law
1489 W. Warm Springs Road, Suite 100
Henderson, NV 89014
michelle@hauserfamilylaw.com
Attorney for Plaintiff Eric Nelson
Individually

MICHAELSON LAW

/s/ Michelle Ekanger

An Employee of Michaelson Law

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-	Client	Trans Date		Tcode/ Task Code	Rate	Amount		Ref#
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Nelson, Eric L	2000 0001	10/20/2021	21 /		0.250	1 25		ARCH
Fire L. Nelson Nevada Trust dated May 30, 2001 11/103/2021 21 A 62 0.250 0.250 0.250 Copy charges Nelson, Eric L Lelson Nevada Trust dated May 30, 2001 11/107/2021 21 A 62 0.250 3.00 Copy charges Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 Eric L. Nelson Nevada Trust dated May 30, 2001	2998.0001	10/26/2021	21 2	4 02	0.230	7.23		
New York								
Fric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson Nevad	2998.0001	11/03/2021	21 A	62	0.250	0.50	· · · –	ARCH
2998.0001 11/10/2021 21 A 62 0.250 3.00 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/15/2021 21 A 62 0.250 3.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/18/2021 21 A 62 0.250 1.25 Copy charges. Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 12/06/2021 21 A 62 0.250 4.00 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 12/06/2021 21 A 62 0.250 2.53.25 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.53.25 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Rick Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 11/10/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 11/10/2022 11/10/2022 21 A 62 0.250							•	
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Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Er	2998.0001	11/10/2021	Z1 F	4 02	0.230	J.00		<u>-</u>
Nelson, Eric L Nelson Nevada Trust dated May 30, 2001								
Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARC	2998.0001	11/15/2021	21 A	62	0.250	3.50		ARCH
2998.0001							•	
Nelson, Fric L Fric L Nelson Nevada Trust dated May 30, 2001 Sept. 10, 10, 10, 10, 10, 10, 10, 10, 10, 10,	2000 0004	44.40./2024	21.4		0.350	1 25	-	ARCH
Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 200	2998.0001	11/18/2021	21 F	N 62	0.250	1.45		7.11-211
2998.0001 12/08/2021 21 A 62 0.250 253.25 Nelson, Fric L							· · · · · · · · · · · · · · · · · · ·	
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2998.0001 01/07/2022 21 A 62 0.250 253.25 Copy charges. Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 2998.0001 01/31/2022 21 A 62 0.250 13.50 Copy charges. Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 2998.0001 02/01/2022 21 A 62 0.250 2.50 Copy charges. Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 2998.0001 02/01/2022 21 A 62 0.250 32.25 Copy charges. Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 2998.0001 02/01/2022 21 A 62 0.250 32.25 Copy charges. Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 2998.0001 02/11/2022 21 A 62 0.250 32.25 Copy charges. Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 2998.0001 02/11/2022 21 A 62 0.250 8.50 Copy charges. Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L								
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Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/31/2022 21 A 62 0.250 13.50 Copy charges. Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/01/2022 21 A 62 0.250 0.50 Copy charges. Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/04/2022 21 A 62 0.250 0.50 Copy charges. Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/11/2022 21 A 62 0.250 32.25 Copy charges. Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/11/2022 21 A 62 0.250 8.50 Copy charges. Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/11/2022 21 A 62 0.250 8.50 Copy charges. Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/11/2022 21 A 62 0.250 8.50 Copy charges. Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L E	2998.0001	01/07/2022	21 F	A 62	0.230	255,25	., -	,
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Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001								
Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/04/2022 21 A 62 0.250 32.25 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH 2998.0001 02/11/2022 21 A 62 0.250 8.50 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH 2998.0001 02/17/2022 21 A 62 0.250 55.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH 2998.0001 02/22/2022 21 A 62 0.250 68.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH 2998.0001 02/22/2022 21 A 62 0.250 68.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH	2998.0001	02/01/2022	21 A	62	0.250	0.50	Copy charges.	ARCH
2998.0001 02/04/2022 21 A 62 0.250 32.25 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH 2998.0001 02/11/2022 21 A 62 0.250 8.50 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH 2998.0001 02/17/2022 21 A 62 0.250 55.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH 2998.0001 02/22/2022 21 A 62 0.250 68.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH 2998.0001 02/24/2022 21 A 62 0.250 48.25 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH AA2252								
2998.0001 02/11/2022 21 A 62 0.250 8.50 Copy charges. Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/17/2022 21 A 62 0.250 55.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/22/2022 21 A 62 0.250 55.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/22/2022 21 A 62 0.250 68.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/24/2022 21 A 62 0.250 48.25 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/24/2022 21 A 62 0.250 48.25 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH	2022 2024	02/04/2022	71 4	63	0.350	22.25	-	ARCH
Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/11/2022 21 A 62 0.250 8.50 Copy charges. 2998.0001 02/17/2022 21 A 62 0.250 55.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. AA2252	2998.0001	02/04/2022	21 F	N 62	0.250	32.23		7.11.011
2998.0001 02/17/2022 21 A 62 0.250 55.00 Copy charges. Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/22/2022 21 A 62 0.250 68.00 Copy charges. Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001								
Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/17/2022 21 A 62 0.250 55.00 Copy charges. 2998.0001 02/22/2022 21 A 62 0.250 68.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson, Eric L. AA2252	2998.0001	02/11/2022	21 A	62	0.250	8.50		ARCH
2998.0001 02/17/2022 21 A 62 0.250 55.00 Copy charges. 2998.0001 02/22/2022 21 A 62 0.250 68.00 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.								
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Eric L. Nelson Nevada Trust dated May 30, 2001	2998.0001	02/17/2022	21 8	02	0.230	33.00		
2998.0001 02/22/2022 21 A 62 0.250 48.25 Copy charges. Nelson, Eric L. Pric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L.								
Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/24/2022 21 A 62 0.250 48.25 Copy charges. ARCH Nelson, Eric L. AA2252	2998.0001	02/22/2022	21 A	62	0.250	68.00	1.5	ARCH
2998.0001 02/24/2022 21 A 62 0.250 48.25 Copy charges. ARCH Nelson, Eric L. AA2252								
Nelson, Eric L. AA2252	2000 0001	03/14/3033	21 4	. 47	0.250	48 JE		ARCH
AA2252	2 93 8.0001	02/24/2022	21 F	· U4	0.230	-0.LJ		

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date		Tcode/ Task Code	Rate	Amount		Ref#
Tcode 62 Copy ch	arges.					7: 1 N. 1 N. 1 T. 1 details 12: 20 2001	
2998.0001	02/25/2022	21 A	62	0.250	14.00	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	02/28/2022	21 A	62	0.250	64.00	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	03/01/2022	21 A	62	0.250	45.00	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	03/02/2022	21 A	62	0.250	7.75	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	03/04/2022	21 A	62	0.250	0.25	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	03/09/2022	21 A	62	0.250	29.50	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges.	ARCH
2998.0001	03/15/2022	21 A	62	0.250	8.00	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges.	ARCH
2998.0001	03/17/2022	21 A	62	0.250	42.25	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges.	ARCH
2998.0001	03/18/2022	21 A	62	0.250	0.50	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges.	ARCH
						Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	03/21/2022	21 A		0.250		Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	03/22/2022	21 A	62	0.250	1.25	Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	03/23/2022	21 A	62	0.250	20.50	Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	03/25/2022	21 A	62	0.250	7.50	Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	03/26/2022	21 A	62	0.250	7.75	Copy charges. Nelson, Eric L.	ARCH
2998.0001	03/27/2022	21 A	62	0.250	5.75	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	03/28/2022	21 A	62	0.250	22.50	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	03/29/2022	21 A	62	0.250	34.75	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	03/30/2022	21 A	62	0.250	2.00	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	03/31/2022	21 A	62	0.250	0.25	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges.	ARCH
2998.0001	04/05/2022	21 A	62	0.250	73.25	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges.	ARCH
2998.0001	04/06/2022	21 A	62	0.250	0.25	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges.	ARCH
23 30. 000 f	0 -1 / 00/ 2022	21 A	, JL	3.233	5,29	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	AA2253

Date: 12/09/2022

Detail Cost Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date		H Tcode/ P Task Code	Rate	Amount		Ref#
Tcode 62 Copy ch	arges.						
2998.0001	04/26/2022	21 /	A 62	0.250	45.00	Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	05/02/2022	21 /	A 62	0.250	15.25	Copy charges. Nelson, Eric L.	ARCH
2998.0001	06/09/2022	21 /	A 62	0.250	38.50	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	06/10/2022	21 /	A 62	0.250	40.00	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	06/14/2022	21	A 62	0.250	2.00	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	08/23/2022	21 .	A 62	0.250	13.75	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L.	ARCH
2998.0001	08/25/2022	21 /	A 62	0.250	3.75	Eric L. Nelson Nevada Trust dated May 30, 2001 Copy charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
Total for Tcode 6	2			Billable	2,348.25	Copy charges.	

Date. 12,03,2022				Solomon Dwig	gins Freer 8	प्रे Steadman, Ltd.	
	Trans		H Tcode/	Data	Amount		Ref #
Client	Date	Tkpr	P Task Code	Rate	Amount		
Tcode 63 Color pl	03/19/2020	21 /	A 63	0.500	10.00	Color photocopies.	ARCH
2998.0001	03/13/2020	21 /	n 05	0.500	10.00	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	03/23/2020	21 /	A 63	0.500	9.50	Color photocopies.	ARCH
						Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	03/23/2020	21 /	A 63	0.500	9.50	Color photocopies.	ARCH
						Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
2000 0001	06/10/2020	21 /	A 63	0.500	1.00	Color photocopies.	ARCH
2998.0001	00/10/2020	21 /	H 03	0.500	1.00	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	09/01/2020	21 /	A 63	0.500	1.00	Color photocopies.	ARCH
						Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	04/12/2021	21	A 63	0.500	0.50	Color photocopies.	ARCH
						Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
2000 0001	04/14/2021	21	A 63	0.500	0.50	Color photocopies.	ARCH
2998.0001	04/14/2021	21	A 05	0.300	0.50	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	04/21/2021	21 .	A 63	0.500	1.00	Color photocopies.	ARCH
						Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	05/04/2021	21	A 63	0.500	24.00	Color photocopies.	ARCH
						Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
2000 0001	00/04/2021	21	A 63	0.500	1.50	Color photocopies.	ARCH
2998.0001	06/01/2021	21 .	A 65	0.500	1.50	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	01/06/2022	21 .	A 63	0.500	2.50	Color photocopies.	ARCH
						Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	01/07/2022	21 .	A 63	0.500	4.50	Color photocopies.	ARCH
						Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	02/04/2022	21 .	A 63	0.500	8.50	Color photocopies.	ARCH
2990.0001	02/04/2022	21	A 93	0.500		Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	02/24/2022	21	A 63	0.500	4.00	Color photocopies.	ARCH
						Nelson, Eric L.	
					4.00	Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	02/25/2022	21 .	A 63	0.500	1.00	Color photocopies. Nelson, Eric L.	ARCH
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	03/22/2022	21 .	A 63	0.500	1.50	Color photocopies.	ARCH
2330.0001	03/22/2022	21	A 03	0.500		Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	03/23/2022	21	A 63	0.500	2.50	Color photocopies.	ARCH
						Nelson, Eric L.	
					5.00	Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	03/25/2022	21 .	A 63	0.500	5.00	Color photocopies. Nelson, Eric L.	ARCH
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	03/26/2022	21 .	A 63	0.500	0.50	Color photocopies.	ARCH
2936,0001	00,20,202					Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	. = = :
2998.0001	03/27/2022	21 .	A 63	0.500	22.00	Color photocopies.	ARCH
						Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
Total for Tcode 6	2			Billable	110.50	Color photocopies.	
TOTAL TOT TOUR D	-			-11000			

EXHIBIT 4

EXHIBIT 4

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date			Tcode/ Task Code	Rate	Amount			Ref#
Tcode 60 Scan ch	arges.		_						
2998.0001	06/20/2017	1	Α	60	0.100	0.70	Scan charges. Nelson, Eric L.	,	ARCH
2998.0001	06/22/2017	1	Α	60	0.100	0.20	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	,	ARCH
2998.0001	06/27/2017	1	Α	60	0.100	0.30	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	,	ARCH
2998.0001	06/28/2017	1	Α	60	0.100	0.70	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	,	ARCH
				50	0.100	11 10	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001		ARCH
2998.0001	07/05/2017	1	А	60	0.100	11,10	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	,	
2998.0001	07/07/2017	1	Α	60	0.100	1.60	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	,	ARCH
2998.0001	08/04/2017	1	Α	60	0.100	3.60	Scan charges. Nelson, Eric L.	,	ARCH
2998.0001	10/17/2017	1	Α	60	0.100	0.20	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	,	ARCH
2998.0001	11/20/2017	1	Α	60	0.100	0.20	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	,	ARCH
2008 0001	11/21/2017	1	^	60	0.100	5.00	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	,	ARCH
2998.0001	11/21/2017	1	A	60	0.100	J.00	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001		
2998.0001	11/30/2017	1	Α	60	0.100	5.00	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	,	ARCH
2998.0001	12/14/2017	1	Α	60	0.100	2.20	Scan charges. Nelson, Eric L.	,	ARCH
2998.0001	12/20/2017	1	Α	60	0.100	0.30	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	ı	ARCH
2998.0001	12/28/2017	1	Α	60	0.100	0.60	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	,	ARCH
2998.0001	01/03/2018	1	Α	60	0.100	0.30	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	ı	ARCH
2998.0001	01/23/2018	1	Α	60	0.100	1.60	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	,	ARCH
2998.0001	01/31/2018	1	Α	60	0.100	0.20	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	,	ARCH
				50	0.100	0.10	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.		ARCH
2998.0001	02/23/2018	1	А	60	0.100	U.10	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001		
2998.0001	03/12/2018	1	Α	60	0.100	10.10	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	,	ARCH
2998.0001	03/19/2018	1	Α	60	0.100	1.10	Scan charges. Nelson, Eric L.	,	ARCH
2998.0001	05/07/2018	1	Α	60	0.100	0.40	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	,	ARCH
2998.0001	05/09/2018	1	Α	60	0.100	0.40	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	AA2257	ARCH
								E 14 - 12 (00 (2022)	20

Solomon Dwiggins Freer & Steadman, Ltd.

Trode 60 Scan harsyse. 2998.0001 08/16/2018 1 A 60 0.100 0.000 0.000 Scan charges. 2998.0001 05/21/2018 1 A 60 0.100 0.000 0.000 Scan charges. 2998.0001 05/21/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/21/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/21/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/21/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/21/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/21/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/21/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 07/08/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 07/08/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/08/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 17/05/2018 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.100 0.000 Scan charges. 2998.0001 05/20/2019 1 A 60 0.	Client	Trans Date	H Tkpr P	Tcode/ Task Code	Rate	Amount		Ref #
Nelson, Fire L Nelson Newards Trust dated May 30, 2001 Fire L Nelson Newards Tru			rapi r	Tusk Code				
2998.0001 05/12/2018 1 A 60 0.100 0.70 Scan charges Nelson, Efe L Effici. Nelson Nevada Trust dated May 30, 2001 Nelson, Eff L Effici. Nelson Nevada Trust dated May 30, 2001 Nelson, Eff L Eff L Nelson	TCDGe oo scan cii	arges.					Nelson, Eric L.	
2998.0001 05/10/2018 1 A							_	ADCU
Effic Nelson Newada Trust dated May 30, 2001 ARCH Nelson, Fire Nelson,	2998.0001	05/10/2018	1 A	60	0.100	0.70	_	ARCH
2998.0001 05/21/2018 1 A 60 0.100 0.86 Scan charges. Network Field L. Network Peads Trust dated May 30, 2001 1.76								
Nelson, Eric L	2998.0001	05/21/2018	1 A	60	0.100	0.80		ARCH
2998.0001 05/22/2018 1 A 60 0.100 6.00 Scan charges. Netonc, Fric L Netson Nevada Trust dated May 30, 2001 ARCH Netson Net	2330,000	,,					Nelson, Eric L.	
Nelson, Eric L Fire L Nelson Nervada Trust dated May 30, 2001 ARCH							_	ADCH.
Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson	2998.0001	05/22/2018	1 A	60	0.100	6.00	-	ANCII
2998.0001 06/14/2018 1 A 60 0.100 3.10 Scan charges. ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH Nelson, Eric L Eric L. Nelson Newadā Trust dated May 30, 2001 ARCH N							•	
Nelson, Eric Fric Nelson Nevada Trust dated May 30, 2001	2998.0001	06/14/2018	1 A	60	0.100	3.10	-	ARCH
2998.0001 06/22/2018 1 A 60 0.100 4.50 Sean changes Nelson, Eric L								
2998.0001 07/09/2018 1 A 60 0.100 4.00 5.00 6.00							-	ADCH
Efficic LiveSton Neverda Trust dated May 30, 2001 ARCH	2998.0001	06/22/2018	1 A	60	0.100	4.60	_	ARCH
2998.0001 07/09/2018 1							The state of the s	
Nelson	2998 0001	07/09/2018	1 A	60	0.100	4.00		ARCH
2998.0001 07/18/2018 1 A 60 0.100 0.80 Scan charges. Nelson, Eric L Eric L Nelson Newada Trust dated May 30, 2001 11/05/2018 1 A 60 0.100 0.70 Scan charges. Nelson, Eric L Nelson Newada Trust dated May 30, 2001 11/26/2018 1 A 60 0.100 0.40 Scan charges. Nelson, Eric L Nelson Newada Trust dated May 30, 2001 11/26/2018 1 A 60 0.100 0.40 Scan charges. Nelson, Eric L Nelson Newada Trust dated May 30, 2001 1	2330.000	01,00,00					•	
Nelson, Fire L Nelson Nevada Trust dated May 30, 2001								ARCH
Eric L Nelson Nevada Trust dated May 30, 2001 11/05/2018 1 A 60 0.100 0.70 Sean charges Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 11/26/2018 1 A 60 0.100 0.40 Sean charges Nelson Nevada Trust dated May 30, 2001 New Agent Provided P	2998.0001	07/18/2018	1 A	60	0.100	0.80		ARCH
2998.0001 11/05/2018							•	
Nelson, Eric L Fire L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L Seric L Nelson Nevada Trust	2998 0001	11/05/2018	1 A	60	0.100	0.70		ARCH
2998.0001 11/26/2018 1 A 60 0.100 0.40 Scan charges. Nelson. Eric L Eric L Nelson Nevada Trust dated May 30, 2001 RACH Nelson. Eric L Refer L Nelson Nevada Trust dated May 30, 2001 RACH Nelson. Eric L Refer L Nelson Nevada Trust dated May 30, 2001 RACH Nelson. Eric L Refer L Nelson Nevada Trust dated May 30, 2001 RACH Nelson. Eric L Refer L Nelson Nevada Trust dated May 30, 2001 RACH Nelson. Eric L Refer L Nelson Nevada Trust dated May 30, 2001 RACH Nelson. Eric L Refer L Nelson Nevada Trust dated May 30, 2001 RACH Nelson. Eric L Refer L Nelson Nevada Trust dated May 30, 2001 RACH Nelson. Eric L Refer L Nelson Nevada Trust dated May 30, 2001 RACH Nelson. Eric L Refer L Nelson Nevada Trust dated May 30, 2001 RACH	2550.0001	11,03,2010					Nelson, Eric L.	
2998.0001 11/29/2019 1							•	ADCII
Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust date	2998.0001	11/26/2018	1 A	60	0.100	0.40	5	ARCH
2998.0001 03/14/2019 1								
Nelson, Eric L Fric L Nelson Nevada Trust dated May 30, 2001 Scan charges ARCH	2998 0001	03/14/2019	1 A	60	0.100	0.20		ARCH
2998.0001 03/22/2019 1	2990,0001	03/14/2015		00	Ųu		=	
Nelson, Eric L Fric L Nelson Nevada Trust dated May 30, 2001 ARCH								A.D.C.I.
Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH	2998.0001	03/22/2019	1 A	60	0.100	0.30	_	ARCH
2998.0001 05/20/2019 1								
Nelson, Eric L Fric L Nelson Nevada Trust dated May 30, 2001 Seric L Nelson Neva	2008 0001	05/20/2019	1 Δ	60	0.100	0.30		ARCH
2998.0001 06/06/2019 22	2330.0001	03/20/2013	, ,,	00		*	-	
Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. ARCH								ARGU
Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH	2998.0001	06/06/2019	22 A	60	0.100	1.00	-	ARCH
2998.0001 06/30/2019 1								
Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 07/31/2019 1 A 60 0.100 0.60 Scan charges. ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 08/30/2019 1 A 60 0.100 1.70 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 10/09/2019 22 A 60 0.100 1.70 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 10/31/2019 22 A 60 0.100 1.30 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 11/25/2019 21 A 60 0.100 1.30 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 11/25/2019 21 A 60 0.100 4.50 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/02/2020 21 A 60 0.100 0.100 4.50 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	2998 0001	06/30/2019	1 A	60	0.100	3.10		ARCH
2998.0001 07/31/2019 1	2550.0001	00,50,2015						
Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001								ABCII
Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 10/09/2019 22 A 60 0.100 1.70 2998.0001 10/31/2019 22 A 60 0.100 1.30 2001	2998.0001	07/31/2019	1 A	60	0.100	0.60	•	ARCH
2998.0001 08/30/2019 1								
Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 10/09/2019 22 A 60 0.100 1.70 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 10/31/2019 22 A 60 0.100 1.30 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 11/25/2019 21 A 60 0.100 4.50 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/02/2020 21 A 60 0.100 0.100 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/02/2020 21 A 60 0.100 0.100 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/13/2020 21 A 60 0.100 0.100 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001	2998 0001	08/30/2019	1 A	60	0.100	1.70		ARCH
2998.0001 10/09/2019 22 A 60 0.100 1.70 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 10/31/2019 22 A 60 0.100 1.30 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 11/25/2019 21 A 60 0.100 4.50 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/02/2020 21 A 60 0.100 0.100 0.10 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson Nevada Trust dated May 30, 2001 Con Charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH	2550.0001	00,00,2015		• • •				
2998.0001 10/09/2019 22 A 60 0.100 1.30 Scan charges. Nelson, Eric L.								ADCII
Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 10/31/2019 22 A 60 0.100 1.30 Scan charges. Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 11/25/2019 21 A 60 0.100 4.50 Scan charges. Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/02/2020 21 A 60 0.100 0.100 0.100 Scan charges. Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 C. Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson Nevada Trust	2998.0001	10/09/2019	22 A	60	0.100	1.70		AKCH
2998.0001 10/31/2019 22 A 60 0.100 1.30 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001								
Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	2998 0001	10/31/2019	22 A	60	0.100	1.30		ARCH
2998.0001 11/25/2019 21 A 60 0.100 4.50 Scan charges. Nelson, Eric L. 2998.0001 01/02/2020 21 A 60 0.100 0.100 Scan charges. ARCH 2998.0001 01/13/2020 21 A 60 0.100 0.100 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/13/2020 21 A 60 0.100 0.80 Scan charges. ARCH Nelson, Eric L. Nelson, Eric L. Nelson, Eric L. Nelson, Eric L.	2550.0001	10,01,201						
2998.0001 01/02/2020 21 A 60 0.100 Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/02/2020 21 A 60 0.100 0.10 Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/13/2020 21 A 60 0.100 0.80 Scan charges. Nelson, Eric L.								ADCII
Page	2998.0001	11/25/2019	21 A	60	0.100	4.50		AKCH
2998.0001 01/02/2020 21 A 60 0.100 0.10 Scan charges. ARCH Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/13/2020 21 A 60 0.100 0.80 Scan charges. ARCH Nelson. Eric L. Nelson. Eric L.							The state of the s	
Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/13/2020 21 A 60 0.100 0.80 Scan charges. ARCH Nelson, Eric L.	2998 0001	01/02/2020	21 A	60	0.100	0.10		ARCH
2998.0001 01/13/2020 21 A 60 0.100 0.80 Scan charges. ARCH Nelson, Eric L.	2000.0007	.,,	//	= =			Nelson, Eric L.	
2998.0001 01/13/2020 21 A 60 0.100 0.00 Scan charges. Nelson. Eric L.								ABCII
AA2258	2998.0001	01/13/2020	21 A	60	0.100	0.80		АКСП
							regon, the ti	AA2258

Detail Cost Transaction File ListSolomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date		Tcode/ Task Code	Rate	Amount		Ref #
Tcode 60 Scan ch	arges.						
2998.0001	01/16/2020	21 A	60	0.100	0.80	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	ARCH
2998.0001	02/18/2020	21 A	60	0.100	3.70	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	ARCH
2998.0001	02/24/2020	21 A	60	0.100	3.40	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	ARCH
2998.0001	03/12/2020	21 A	. 60	0.100	1.20	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	ARCH
2998.0001	05/27/2020	21 A	60	0.100	0.80	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	ARCH
2998.0001	03/21/2020	21 A				Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	06/05/2020	21 A	. 60	0.100	1.10	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	07/16/2020	21 A	60	0.100	2.50	Scan charges. Nelson, Eric L. Fried May 20, 2001	ARCH
2998.0001	07/30/2020	21 A	60	0.100	0.60	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	ARCH
2998.0001	11/18/2020	21 A	60	0.100	0.20	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	ARCH
2998.0001	01/14/2021	21 A	60	0.100	2.20	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	ARCH
2998.0001	04/20/2021	21 A	60	0.100	31.00	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	ARCH
2990.0001						Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	05/07/2021	21 A	60	0.100	19.50	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	02/24/2022	21 A	60	0.100	0.80	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	02/28/2022	21 A	60	0.100	22.40	Scan charges. Nelson, Eric L.	ARCH
2998.0001	03/11/2022	21 A	60	0.100	24.50	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	ARCH
2998.0001	03/15/2022	21 A	60	0.100	14.10	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges. Nelson, Eric L.	ARCH
2998.0001	03/17/2022	21 A	60	0.100	1.10	Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	ARCH
2998.0001	03/18/2022	21 A	60	0.100	3.20	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Scan charges.	ARCH
				0.100	F.C. 0.0	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	03/23/2022	21 A	. 60	0.100		Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	03/24/2022	21 A	. 60	0.100	0.20	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	03/25/2022	21 A	60	0.100	1.20	Scan charges. Nelson, Eric L.	ARCH
						Eric L. Nelson Nevada Trust dated May 30, 2001	AA2259

Date: 12/09/2022

Detail Cost Transaction File List

Page: 14

Solomon Dwiggins Freer & Steadman, Ltd.

Clien	Trans t Date		H Tcode/ P Task Code	Rate	Amount		Ref#
Tcode 60 Scan	charges.						
2998.0001	03/29/2022	21	A 60	0.100	2.00	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	04/05/2022	21	A 60	0.100	2.80	Scan charges. Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
Total for Tcode	: 60			Billable Non-billable Total	255.60 23.20 278.80	Scan charges.	

EXHIBIT 5

EXHIBIT 5

Date: 12/09/2022

Detail Cost Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date	Tkpr	-	Tcode/ Task Code	Rate	Amount	Ref #
Tcode 59 Professio 2998.0001	onal Copy Cha 04/05/2022	18	Α	59		3,120.66 Outside copy service - Trial Exhibit Binders and OCRing Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
Total for Tcode 59					Billable	3,120.66 Professional Copy Charges.	

BANK OF GEORGE LAS VEGAS, NV 89148 20279

9060 W CHEYENNE AVE LAS VEGAS, NV 89129-8932 94-236/1224

4/5/2022

PAY TO THE ORDER OF

No Rush Charge Imagining, LLC

(702) 853-5483

**3,120.66

Three Thousand One Hundred Twenty and 66/100*

DOLLARS



No Rush Charge Imagining, LLC 2250 S. Rancho Drive Suite 135 Las Vegas, NV 89102



CASH ONLY IF ALL CHECKLOCK SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

Void after 90 days



Details on Back

Secure Check

MEMO

2998.0001/Outside Copy Service

1010216869 #D2D279# #1224D2366#

Solomon Dwiggins Freer & Steadman, Ltd. No Rush Charge Imagining, LLC

4/5/2022

20279

Outside copy service - Trial Exhibit Binders and OCRI Invoice# NRC01806838 and NRC01806810

3,120.66

Nelson, Eric

BOG-Operating (6869 2998.0001/Outside Copy Service

3,120.66

Solomon Dwiggins Freer & Steadman, Ltd. No Rush Charge Imagining, LLC

4/5/2022

Outside copy service - Trial Exhibit Binders and OCRi Invoice# NRC01806838 and NRC01806810

3,120.66

20279

Nelson, Eric

2998.0001/Outside Copy Service

3,120.66



BOG-Operating (6869









REC	G ACCT. TRUST ACCT. PETTY CASI	H OTHER:
Payee:	No Rush Charge Imaging LLC 2250 S. Rancho Drive Suite 135 Las Vegas NV 89102	
Amt \$3,120	0.66	
Purpose:	Outside Copy Service - Trial Exhibit Bir	nders and OCRing
Invoice No	o(s).: NRC01806810 and NRC01806838	
Client:	2998.0001 - Nelson, Eric Nelson v. Nelson	
Return to	:_Sherry	
Other inst	tructions:	
Signature	- 100 rusy	Date: 04/ /2022

BY: \$ \$ \$

Invoice

NRC/ DISCOVERY

No Rush Charge Imaging, LLC

2250 S. Rancho Drive, Suite 135 Las Vegas, NV 89102 702-369-1437

Date	Invoice #
3/23/2022	NRC01806838

Bill To	
Solomon Dwiggins & Freer, Ltd. Cheyenne West Professional Center 9060 W. Cheyenne Avenue Las Vegas, NV 89129	

Net 30	Description Client: Solomon Dwiggins & Freer, Ltd. Case: Nelson v. Nelson 2998.0001 Contact: Sherry Keast	3/25/2022 Rate 0.00	KA	83-0801694 Amount 0.00'T
antity	Client: Solomon Dwiggins & Freer, Ltd. Case: Nelson v. Nelson 2998.0001			
	Case: Nelson v. Nelson 2998.0001	0.00		0 00'T
	Description: Print single sided, tab and place into binders x 3 (2 court copies, 1 attorney copy) Print double sided, tab and place into binders x 2 (2 internal Solomon Copies)			3.007
288	5 sets of B&W Prints Custom 5 Bank Mylar Tabs 3 Inch Binder Sales Tax	0.14 0.75 20.00 8.375%		1,698.90T 216.00T 320.00T 187.17

Payments for any services will be due on 30th day of invoicing. A service charge of 1.5% per month (18 per year) will be made on past due balances, plus all attorney fees, legal court cost as may be incurred to enforce collection are the responsibilities of the client. We recognize that some of our clients may be billing these expenses through to thier customers. In any case, the No Rush Charge Reprographics client remains responsible to pay us in our terms regardless of their receivables.

 Total
 \$2,422.07

 Balance Due
 \$2,422.07

Invoice

NRCV DISCOVERY

No Rush Charge Imaging, LLC

2250 S. Rancho Drive, Suite 135 Las Vegas, NV 89102 702-369-1437

Date	Invoice #
3/17/2022	NRC01806810

Bitl To	
Solomon Dwiggins & Freer, Ltd. Cheyenne West Professional Center 9060 W. Cheyenne Avenue Las Vegas, NV 89129	

P.O. No.	Terms		Delivery Date	Rep	Tax ID#		
2998.0001	Net 30		3/18/2022	KA	83-0801694		
Item	Quantity	Description	Rate	Rate			
Job Information		Client: Solomon Dwiggins & Freer, Ltd. Case: 2998.0001 Contact: Sherry Keast Description: OCR document and send link	0.00		0.007		
Technial	1.5	Tech Time - Manually seperation of original PDF to efficiently OCR and manual recombine for deliverable	65.00		97.50T		
OCR	10,942	OCR - Optical Character Recognition (Per Page) Sales Tax	0.05 8.375%		547.10T 53.99		

Payments for any services will be due on 30th day of invoicing. A service charge of 1.5% per month (18 per year) will be made on past due balances, plus all attorney fees, legal court cost as may be incurred to enforce collection are the responsibilities of the client. We recognize that some of our clients may be billing these expenses through to thier customers. In any case, the No Rush Charge Reprographics client remains responsible to pay us in our terms regardless of their receivables.

Total	\$698.59
Balance Due	\$698.59

EXHIBIT 6

EXHIBIT 6

Date: 12/09/2022

Detail Cost Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date		H Tcode/ P Task Code	Rate Amo	ount		Ref #
Tcode 53 Postage.							
2998.0001	06/30/2017	1.	A 53		3.29 P	Postage.	ARCH
						Nelson, Eric L.	
						ric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	10/31/2017	1 .	A 53	•		Postage.	ARCH
						Nelson, Eric L.	
						ric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	11/30/2017	1 .	A 53	•		Postage.	ARCH
						Nelson, Eric L.	
						ric L. Nelson Nevada Trust dated May 30, 2001	ADGU
2998.0001	02/28/2018	1 .	A 53			Postage.	ARCH
						Nelson, Eric L.	
						ric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	01/31/2019	1 .	A 53	'		Postage.	AKCH
						Nelson, Eric L.	
						ric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	10/31/2019	1 .	A 53			ostage.	ARCH
						Nelson, Eric L.	
						ric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	10/31/2019	1 .	A 53	•		Postage.	ANCII
						lelson, Eric L. iric L. Nelson Nevada Trust dated May 30, 2001	
		40					ARCH
2998.0001	02/28/2022	18	A 53			ostage. Velson, Eric L.	riteri
						ric L. Nelson Nevada Trust dated May 30, 2001	
2022 2024	04/20/2022	10	A F3	,		Postage.	ARCH
2998.0001	04/30/2022	18 .	A 53	·		ostage. Jelson, Eric L.	7111011
						ric L. Nelson Nevada Trust dated May 30, 2001	
					_	ine E. Nelson Nevada Trast dated may 30, 2001	
Total for Tcode 53				Billable 1	2.12 P	ostage.	



Receipt

Print Date: Dec 09, 2022

RETURN TO	REFERENCE	
LAS VEGAS	Ship Date:	Feb 04, 2022
US	Ship from ZIP:	89129
LAS VEGAS, NV 89129	Weight:	0 lbs. 1 oz.
	User:	sdflaw
SHIP TO	Cost Code:	2998.0001
Nationwide Legal	Refund Type:	E-refund
1609 James M. Wood Blvd.	Reference #:	
Los Angeles, CA 89129 US	Printed on:	Shipping label
	Tracking #:	00040899563788782047

SERVICE		UNIT PRICE
First Class ® Envelope		\$0.53
Tracking		\$0.00
Insurance (N/A)		
	Subtotal	\$0.53
	Label Quantity	1
	Total Cost	\$0.53

Stamps Print Receipt Page 1 of 1



Receipt

Print Date: Dec 09, 2022

RETURN TO	REFERENCE	
LAS VEGAS	Ship Date:	Feb 04, 2022
US	Ship from ZIP:	89129
LAS VEGAS, NV 89129	Weight:	0 lbs. 1 oz.
	User:	sdflaw
SHIP TO	Cost Code:	2998.0001
Nationwide Legal	Refund Type:	E-refund
1609 James M. Wood Blvd.	Reference #:	
Los Angeles, CA 89129 US	Printed on:	Shipping label
	Tracking #:	00040899563788782034

SERVICE		UNIT PRICE
First Class ® Envelope		\$0.53
Tracking		\$0.00
Insurance (N/A)		
	Subtotal	\$0.53
	Label Quantity	1
	Total Cost	\$0.53

Stamps Print Receipt Page 1 of 1



Receipt

Print Date: Dec 09, 2022

R	ETURN TO	REFERENCE	
٨	ARILYN COWART	Ship Date:	Apr 06, 2022
7	881 W CHARLESTON BLVD STE 240	Ship from ZIP:	89117
L	AS VEGAS, NV 89117	Weight:	0 lbs. 1 oz.
		User:	sdflaw
S	HIP TO	Cost Code:	2998.0001
N	O RUSH CHARGE IMAGINING	Refund Type:	Mail-in
2	250 S RANCHO DR STE 135	Reference #:	
L	AS VEGAS, NV 89117 US	Printed on:	Shipping label
		Tracking #:	00040899563787283119

SERVICE		UNIT PRICE
First Class ® Envelope		\$0.53
Tracking		\$0.00
Insurance (N/A)		
	Subtotal	\$0.53
	Label Quantity	1
	Total Cost	\$0.53

EXHIBIT 7

EXHIBIT 7

	Trans Date		Tcode/ Task Code	Rate	Amount			Ref#
Client ID 2998.0001 2998.0001		1 A	70			\$3,50	Electronic Filing fee for Stipulation and Order Releasing Superseadeas Bond	ARCH
2998.0001 (2998.0001 (1 A				\$3.50 \$29.25	Electronic Filing fee for Notice of Entry of Stipulation and Order Electronic Filing Fee for Motion to Enforce Supreme Court's Order Dated May 25, 2017; Motion to Hold Lynita S. Nelson in Contempt for Violation of Sep	ARCH ARCH
2998.0001	08/04/2017	1 A	. 70			\$3.50	Attorneys' Fees and Costs Electronic Filing Fee for Reply to Opposition to Motion to Enforce Supreme Court's Order Dated May 25, 2017; Motion to Hold Lynita S. Nelson in Contempt for Violation of September 22, 2014 Order, and for Attorneys' Fees and Costs and Opposition to Countermotion for Final Judgment Consistent with the Nevada Supreme Court's Remand, or in the Alternative, for Affirmation of Joint Preliminary Injunction, for a Receiver to Manage the Property Pending Final Judgment, for Updated Financial Disclosures and Exchange of Financial Information, and for Sale of Property for Payment of Attorneys' Fees and Costs	ARCH
2998,0001	08/29/2017	1 A	. 70			\$3.50	Etectronic Filing Fee for Response to Defendant's Reply to Opposition to Countermotion for Final Judgment Consistent with the Nevada Supreme Court's Remand or, in the Alternative, for Affirmation of Joint Preliminary Injunction, for a Receiver to Manage the Property Pending Final Judgment, for Updated Financial Disclosures and Exchange of Financial Information, and for Sale of Property for Payment of Attorneys' Fees and Costs	ARCH
2998.0001	11/30/2017	1 A	. 70			\$3.50	Electronic Filing Fee for Response to Court Ordered Accountings; Motion to Compel Production of Back-Up Documentation; and for Attorneys' Fees and Costs	ARCH
	12/20/2017 03/19/2018	1 A				\$3.50 \$3.50	Electronic Filing Fee for Re-Notice of Hearing Electronic Filing fee for Motion for a Finding of Contempt, for	ARCH ARCH
2996,0001	03/13/2010						Implementation of the Penalties of Contempt, for Attorneys' Fees and Costs, and for Other Related Relief	ARCH
2998.0001	05/09/2018	1 A	. 70			\$3.50	Electronic Filing Fee for Notice of Filing Petition for Writ of Mandamus	
2998.0001	05/09/2018	1 A	, 70			\$3.50	Electronic Filing Fee for Stipulation and Order Vacating Motion for a Finding of Contempt for Implementation of the Penalties of Contempt, for Attorneys' Fees and Costs, and for other Related Relief; and Countermotion for an Award of Attorneys' Fees and Costs	ARCH
	05/10/2018	1 A				\$3.50	Electronic Filing Fee for Notice of Entry of Stipulation and Order Electronic Filing Fee for Initial Opposition to Lynita Nelson's	ARCH ARCH
2998.0001	05/21/2018	1 A	70			\$3.50	Motion for Reconsideration and Clarification of the Court's Decision Entered April 19, 2018; Counterpetition to Remove Lis Pendens Inappropriately Filed by the LSN Trust; and for Attorneys' Fees and Costs	
2998.0001	05/23/2018	1 A	70			\$3.50	Electronic Filing Fee for Joinder to Motion to Stay Proceedings Pending Petition for Writ of Mandamus	ARCH
2998.0001	06/25/2018	1 A	. 70			\$3.50	Electronic Filing Fee for Opposition to Lynita Nelson's Motion for Reconsideration and Clarification of the Court's Decision Entered May 22, 2018; and Countermotion to (1) Terminate the JPI; (2) Impose a Bond on Any Property Subject to the JPI; (3) Expunge the Inappropriately Recorded Lis Pendens; (4) Allow the ELN Trust to Manage Lindell; and (5) for Attorneys' Fees and Costs	ARCH
2998,0001	07/09/2018	1 A	70			\$29,25	Electronic Filing Fee for Opposition to Lynita Sue Nelson's Motion for an Order to Allow Her to Continue to Manage the Lindell Property, and Requiring Eric Nelson and ELN Trust to Pay Rent for Their Tenancy at the Lindel	ARCH
2998,0001		1 A				\$3.50	Electronic Filing Fee for Notice of Entry Electronic Filing Fee for Reply to Opposition to Lynita Sue	ARCH ARCH
2998,0001	11/26/2018	1 A	. 70			\$3.50	Nelson's Response to ELN Trust's Status Report and ELN Trust's Request to Purchase Brian Head Cabin	
2998.0001	08/07/2019	1 A	70			\$3.50	Electronic Filing Fee for Defendant/Cross-Claimant Matt Klabacka's Joinder to Plaintiff's Brief in Response to Larry Bertsch's Motion for Instruction Dated March 11, 2019	ARCH
2998.0001	10/09/2019	1 A	70			\$3,50		ARCH
2998,0001	11/27/2019	1 A	. 70			\$3,50	Compelling Lynita to Provide Updated Quarterly Accountings Relating to Lindell, for Clarification and/or Dissolution of the JPf, or Alternatively, Motion to Dissolve/Terminate the JPf	ARCH
2998,0001	01/14/2020	# A	. 70			\$3.50	Electronic Filing Fee for Reply to Opposition to Motion for Sale of Lindell, for an Order Compelling Lynita to Provide Updated Accountings Relating to Lindell, for Clarification and/or Dissolution of the JPI, or Alternatively, Motion to Dissolve/Terminate JPL and Opposition to Countermotion for Fees	ARCH
2998,0001	03/23/2020	# A	70			\$3,50	Electronic Filing Fee for Joinder to Eric Nelson's Objection to Larry Bertsch's Final Supplemental Disclosure of Fees and Request for Payment of Fees	ARCH
2998,0001	05/18/2020	# A	. 70			\$3.50	Electronic Filing Fee for Motion for Determination of Burden of	ARCH

2998,0001	06/05/2020	#	Α	70	\$3.50	Proof at Trial, Electronic Filing Fee for Notice of Entry of Order Shortening Time	ARCH
2998.0001	07/07/2020	#	Â	70		Electronic Filing Fee for Reply to Opposition to Motion for	ARCH
2998 0001	07/16/2020	#	Α	70	\$3,50	Determination of Burden of Proof at Trial Electronic Filing Fee for Status Report Regarding Motion for Sale	ARCH
2000.0001	51,10/2020	"		,-		of Lindell, for an Order Compelling Lynita to Provide Update	
						Quarterly Accountings Relating to Lindell, for Clarification and/or Dissolution of the JPI, or Alternatively, Motion to	
						Dissolve/Terminate JPI	ARCH
2998,0001	08/11 / 2020	#	Α	70	\$3.50	Electronic Filing Fee Notice of Lynita S. Nelson's Failure to Respond to Proof of Expenses for Brian Head Cabin	ARCH
2998,0001	09/10/2020	#	Α	70	\$3.50	Electronic Filing Fee for Response to Lynita Sue Nelson's	ARCH
2008 0001	10/20/2020	#	Α	70	\$52.94	Objection to Proof of Expenses for Brian Head Cabin Electronic Filing Fee for (1) Notice of Appeal; and (2) Case Appeal	ARCH
2990.0001	10/20/2020	"	^			Statement	ABOU
2998.0001	11/19/2020	#	Α	70	\$3.50	Electronic Filing Fee for (1) Motion for Protective Order, and (2) Appendix in Support of Matt Klabacka's Motion for Protective	ARCH
						Order	4B0U
2998.0001	12/21/2020	#	A	70 70	\$3,50 \$3,50	Electronic Filing Fee for Status Report Electronic Filing Fee for Status Report and Motion that this Court	ARCH ARCH
2998.0001	01/11/2021	**	^	70	\$3.30	Hold Lynita Sue Nelson in Contempt of the Order from December	
		4		70	82 EO	22, 2020 Hearing Electronic Filing Fee for Matt Klabacka's Reply in Support of	ARCH
2998,0001	01/14/2021	#	Α	70		Motion for Protective Order	
2998.0001	02/12/2021	#	Α	70	\$3,50	Electronic Filing Fee for Motion for Order Compelling Parties to	ARCH
2998.0001	02/18/2021	#	Α	70	\$3.50	Enter into Confidentiality Agreement Electronic Filing Fee for Certificate of Service	ARCH
2998.0001		3	Α	70	\$3.50	Electronic Filing Fee for Notice of Entry of Order	ARCH
2998,0001		3	A	70 70		Electronic Filing Fee for Status Report Electronic Filing Fee for Plaintiff's Authenticity Objection Under	ARCH ARCH
2998,0001	04/20/2021					NRCP 16.2 and/or NRCP 16.205	*501
2998.0001	05/17/2021	#	Α	70	\$3.50	Electronic Filing Fee for Response to Defendant's Notice of Filing and Filing of Arrearage Calculation Summaries for Child Support	ARCH
						and Alimony, Discussed at March 19, 2021 Hearing	
2998,0001	06/03/2021	#	Α	70	\$3,50	Electronic Fiting Fee for Joinder to Eric Nelson's Opposition to Defendant's Objection to Plaintiff's Proposed Subpoenas Duces	ARCH
						Tecum to Anthem Forensics and Melissa Attanasio, and Motion	
					£000 F0	for Protective Order and for Attorney's Fees and Costs	ARCH
2998.0001	06/21/2021	#	Α	70	\$209.50	Electronic Filing Fee for Motion for Summary Judgment, or Alternatively, Motion to Strike and/or Motion to Extend Deadline	Alton
						to File Rebuttal Expert Report and to Continue Trial (First	
2009 0001	07/02/2021	#	Α	70	\$3.50	Post-Appeal Request) Electronic Filing Fee for Ex Parte Application for an Order	ARCH
2000.0001	OTTO ETE DE T					Shortening Time to Hear Motion for Summary Judgment, or	
						Alternatively, Motion to Extend Deadline to File Rebuttal Expert Report and to Continue Trial (First Post-Appeal Request)	
2998,0001	07/28/2021	#	Α	70	\$3,50	Electronic Filing Fee for Reply in Support of Motion for Summary	ARCH
						Judgment, or Alternatively, Motion to Strike and/or Motion to Extend Deadline to File Rebuttal Expert Report and to Continue	
						Trial (First Post-Appeal Request) and Opposition to	
						Countermotion to Compel Production of Documents and for Attorneys' Electronic Filing Fee for Fees and Costs	
2998.0001	09/03/2021	#	Α	70	\$3,50	Electronic Filing Fee for Opposition to Defendant, Lynita S.	ARCH
						Nelson's, Motion to Compel Disclosure regarding Disposition of Proceeds of Russell Road and Ownership of NBGS, LLC; to Freeze	
						Proceeds of the Sale of Russell Road; to Join NBGS, LLC as a	
						Necessary Party; to Require an Accounting of all Assets held in the Parties' Respective Trusts; and for an Award of Attorneys' Fees	
						and Costs	
2998,0001	11/19/2021	#	Α	67	\$3.50		ARCH
						Nelson's, Motion to Correct, Clarify, After or Amend, and/or Reconsider Decision on Motion for Summary Judgment Entered	
						on October 12, 2021 and Counter-Motion in Limine	ARCH
2998,0001	01/10/2022	#	Α	67	\$3,50	Electronic Filing Fee for Partial Response to Lynita S. Nelson's Status Report for January 11, 2022 Hearing, which was Filed at	ARCH
						11:40 P.M. on Friday, January 7, 2022; and Countermotion to	
2008 0004	02/01/2022	*	Α	67	\$3.50	Strike Electronic Filing Fee for Motion for Reconsideration of the Court's	ARCH
2990,0001	02/01/2022	"	^			Decision Entered January 18, 2022	40011
2998.0001	02/14/2022	#	Α	67	\$3.50	Electronic Filing Fee for (1) Objection to Lynita S. Nelson's Proposed Subpoena Duces Tecum to Nevada State Title, LLC, and	ARCH
						Motion for Protective Order and for Attorney's Fees and Costs;	
						and (2) Motion for Reconsideration of the Court's Decision Entered January 31, 2022	
2998.0001	02/18/2022	#	Α	67	\$3.50	Electronic Filing Fee for Opposition to Motion regarding	ARCH
						Management of The Lindell Property; and Countermotion for Attorneys' Fees and Costs; Countermotion for an Order	
						Compelling Lynita/the LSN Trust to Tumover Rent Collected From	
						Lindell; and Countermotion for an Order Compelling Lynita/the LSN Trust to Produce Bank Statements	
2998,0001	02/18/2022	#	Α	67	\$3,50	Electronic Filing Fee for Opposition to Defendant, Lynita S.	ARCH
						Nelson's, Emergency Motion for an Order to Show Cause to Issue Against Eric L. Nelson and Matt Klabacka for Egregious Violations	
						of JPI in Selling Ten Banone Properties, for Funds from Sale to be	
						Deposited Into Blocked Account and Frozen, for Sanctions of	
						Contempt and Attorneys' Fees, and for Related Relief; and Countermotion for Attorneys' Fees and Costs	

2998,0001	02/24/2022	#	Α	67		\$3.50	Electronic Filing Fee for (1) Motion in Limine to Exclude Larry Bertsch, CPA from Testifying at Trial, or, Alternatively, Motion to Compel Production of Larry Bertsch, CPA's Entire File; and (2) Motion for Protective Order and for Attorneys' Fees and Costs	ARCH
2998.0001	02/24/2022	#	Α	67		\$3,50	Electronic Filing Fee for Ex Parte Application for an Order Shortening Time to Hear Motion for Protective Order and for Attorneys' Fees and Costs	ARCH
2998,0001	03/01/2022	#	Α	67		\$3.50	Electronic Filing Fee for Reply in Support of Motion for Reconsideration of the Court's Decision Entered January 18, 2022	ARCH
2998.0001	03/03/2022	#	Α	67		\$3,50	Electronic Filing Fee for Notice of Entry of Order	ARCH
2998.0001	03/15/2022	#	Â	67		\$3.50	Electronic Filing Fee for Reply to Opposition to Motion in Limine to Exclude Larry Bertsch, CPA from Testifying at Trial, or, Alternatively, Motion to Compel Production of Larry Bertsch, CPA's Entire File	ARCH
2998,0001	07/27/2022	#	Α	67		\$3.50	Electronic Filing Fee for Motion to Correct, Clarify, Alter or Amend the Court's Decision Entered June 29, 2022	ARCH
2998.0001	08/01/2022	#	Α	67		\$3,50	Electronic Filing Fee for Eric Nelson and The ELN Trust's Joint Opposition to Defendant, Lynita S. Nelson's Motion to Correct, Clarify, Alter or Amend, and/or Reconsider Decision and Order Entered June 29, 2022	ARCH
2998.0001	08/02/2022	#	Α	67		\$3.50	Electronic Filing Fee for Ex Parte Application for an Order Shortening Time to Hear Motion to Correct, Clarify, Alter or Amend the Court's Decision Entered June 29, 2022	ARCH
2998,0001	08/09/2022	#	Α	67		\$3,50	Electronic Filing Fee for Notice of Entry of Order	ARCH
2998.0001	08/11/2022	#	A	67		\$3,50	Electronic Filing Fee for Receipt of Copy	ARCH
2998.0001	08/26/2022	#	A	67		\$3.50	Electronic Filing Fee for Reply to Opposition to Motion to Correct, Clarify, Alter or Amend the Court's Decision Entered June 29, 2022	ARCH
Total for Client ID 2	2998.0001				Billable	\$520.44	Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	

GRAND TOTALS

Billable \$520.44

EXHIBIT 8

EXHIBIT 8

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Detail Cost Transaction File ListSolomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date	Tkpr P	Tcode/ Task Code	Rate	Amount		Ref#
Tcode 82 Westlaw 2998.0001	06/30/2017	research. 1 A			15.15	Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	07/31/2017	1 A	82		177.35	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	08/31/2017	1 A	82	5.000	2.67	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	08/31/2017	1 A	82	5.000	283.19	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	12/30/2017	1 A	82	5.000	130.11	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	01/31/2018	1 A	82	5.000	24.79	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	05/31/2018	1 A	82	5.000	37.64	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	06/30/2018	1 A	82	5.000	213.94	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	11/30/2018	1 A	82	5.000	25.51	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	05/31/2019	1 A	82	5.000	191.20	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	06/30/2019	1 A	82	5.000	276.43	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	07/31/2019	1 A	82	5.000	51.25	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	08/31/2019	1 A	82	5.000	52.37	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	10/31/2019	1 A	82	5.000	32.20	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L. Frie L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	01/31/2020	18 A	82	5.000	178.50	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	02/29/2020	18 A	82	5.000	54.10	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	03/31/2020	18 A	82	5.000	1,983.05	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	08/31/2020	18 A	82	5.000	24.85	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	09/30/2020	18 A	82	5.000	605.75	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	11/30/2020	18 A	82	5.000	3,880.55	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ARCH
2998.0001	01/31/2021	18 A	82	5.000	944.05	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research. Nelson, Eric L.	ĀRCH
2998.0001	02/28/2021	18 A	82	5.000	605.90	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research.	AA2277

Date: 12/09/2022

Detail Cost Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date	Tkpr		Foode/ Fask Code	Rate	Amount		Ref #
Tcode 82 Westlav	v online legal ı	researc	h.					
							Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
	02/24/2024	10		0.3	5.000	124.40	Westlaw online legal research.	ARCH
2998.0001	03/31/2021	18	А	82	5.000	124.40	Nelson, Eric L.	
							Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	05/31/2021	18	Δ	82	5.000	452 50	Westlaw online legal research.	ARCH
2556.0001	03/31/2021			02	5.000		Nelson, Eric L.	
							Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	06/30/2021	18	Α	82	5.000	838.35	Westlaw online legal research.	ARCH
							Nelson, Eric L.	
							Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	07/31/2021	18	Α	82	5.000	29.25	Westlaw online legal research.	ARCH
							Nelson, Eric L.	
							Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	08/31/2021	18	Α	82	2.000	25.68	Westlaw online legal research.	ARCH
							Nelson, Eric L.	
		40		0.7	1.000	70 11	Eric L. Nelson Nevada Trust dated May 30, 2001 Westlaw online legal research.	ARCH
2998.0001	10/31/2021	18	Α	82	1.000	/0.11	Nelson, Eric L.	7111011
							Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	11/30/2021	18	٨	82	2.000	34.76	Westlaw online legal research.	ARCH
2996.0001	11/30/2021	10	^	02	2.000	J-1.10	Nelson, Eric L.	
							Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	01/31/2022	18	Α	82	2.000	379.08	Westlaw online legal research.	ARCH
2550.0001	0.,0.,2022	, ,					Nelson, Eric L.	
							Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	02/28/2022	18	Α	82	1.000	443.40	Westlaw online legal research.	ARCH
							Nelson, Eric L.	
							Eric L. Nelson Nevada Trust dated May 30, 2001	ADCII
2998.0001	03/31/2022	18	Α	82	1.000	523.86	Westlaw online legal research.	ARCH
							Nelson, Eric L.	
					4.000	205.05	Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	04/30/2022	18	Α	82	1,000	395.05	Westlaw online legal research. Nelson, Eric L.	Alteri
							Eric L. Nelson Nevada Trust dated May 30, 2001	
							Elle E. Helson Hevada Hast dated may 50, 2001	
Total for Tcode 8	2				Billable	13,114,99	Westlaw online legal research.	
10021101 1COGE 0/						,		

GRAND TOTALS

 Billable
 21,995.75

 Non-billable
 23.20

 Total
 22,018.95

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EXHIBIT 9

EXHIBIT 9

Detail Cost Transaction File List Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date		Tcode/ Task Code	Rate	Amount		Ref #
Tcode 72 Courier		1 4	77.7		8 00	Courier fee.	ARCH
2998.0001	06/22/2017	1 A	72		0.00	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	06/27/2017	1 A	72		8.00	Courier fee.	ARCH
						Nelson, Eric L.	
2000 0001	06/20/2017	1 Λ	72		8.00	Eric L. Nelson Nevada Trust dated May 30, 2001 Courier fee.	ARCH
2998.0001	06/28/2017	1 A	12		0.00	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	07/06/2017	1 A	72		8.00	Courier fee.	ARCH
						Nelson, Eric L.	
2222 2224	07/40/0047	1 6	73		8.00	Eric L. Nelson Nevada Trust dated May 30, 2001 Courier fee.	ARCH
2998.0001	07/12/2017	1 A	72		6.00	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	08/04/2017	1 A	72		8.00	Courier fee.	ARCH
						Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	08/07/2017	1 A	72		8.00	Courier fee. Nelson, Eric L.	ARCH
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	08/30/2017	1 A	72		8.00	Courier fee.	ARCH
2550.0001	00,50,2011					Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	ARGU
2998.0001	12/15/2017	1 A	72	8.000	8.00	Courier fee.	ARCH
						Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
2000 0001	10/20/2017	1 A	72	8.000	8.00	Courier fee.	ARCH
2998.0001	12/20/2017	I A	12	0.000	0.00	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	01/03/2018	1 A	72	8.000	8.00	Courier fee.	ARCH
						Nelson, Eric L.	
				2.000	0.00	Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	02/26/2018	1 A	72	8.000	8.00	Courier fee. Nelson, Eric L.	ANCIT
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	04/24/2018	1 A	72	8.000	8.00	Courier fee.	ARCH
2330.000	- , - ,,					Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	ADCLI
2998.0001	05/07/2018	1 A	7 2	8.000	8.00	Courier fee.	ARCH
						Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	05/09/2018	1 A	72	8.000	8.00	Courier fee.	ARCH
2550.0001	03/03/2010		12	0.000	0.00	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	05/15/2018	1 A	72	8.000	8.00	Courier fee.	ARCH
						Nelson, Eric L.	
2000 0001	00 (40 (2048)	4 4	73	8.000	9.00	Eric L. Nelson Nevada Trust dated May 30, 2001 Courier fee.	ARCH
2998.0001	06/19/2018	1 A	72	6.000	8.00	Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	06/26/2018	1 A	72	8.000	8.00	Courier fee.	ARCH
						Nelson, Eric L.	
				0.000	0.00	Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
2998.0001	07/10/2018	1 A	72	8.000	8.00	Courier fee. Nelson, Eric L.	ARCH
						Eric L. Nelson Nevada Trust dated May 30, 2001	
2998.0001	07/11/2018	1 A	72	8.000	8.00	Courier fee.	ARCH
2330.0001	2.,, 20.0		-			Nelson, Eric L.	
						Eric L. Nelson Nevada Trust dated May 30, 2001	4000
2998.0001	08/23/2018	1 A	72	8.000	8.00	Courier fee.	ARCH
						Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	
2000 0004	00/20/2019	1 A	72	8.000	8.00	Courier fee.	ARCH
2998.0001	08/29/2018	I A	16	0.000	0,00		AA2280
							Fuiday 12/00/2022 2:20 nm

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Detail Cost Transaction File List Solomon Dwiggins Freer & Steadman, Ltd.

Nelson, Eric Fire L. Nelson Nevada Trust dated May 30, 2001 Fire L. Nelson Nevada Trust dated May 30, 2001 Fire L. Nelson, Nevada Trust da	Client	Trans Date	Tkpr		Tcode/ Task Code	Rate	Amount		Ref#
Eric L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Relson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust dat	Tcode 72 Courier	fee.						Nelson Fric I	
2998.0001 11/21/2018 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L Eric L Nelson Nevada Trust dated May 30, 2001									
Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 11/26/2018 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 03/15/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 03/15/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 07/30/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 08/02/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 08/07/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 08/07/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 12/02/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 12/10/2019 1 B A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 12/10/2019 1 B A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 01/14/2020 1 B A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2021 1 B A 72 8.000 8.00 Courier fee. Nelson, Eric L Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2021 1 B A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2022 1 B A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2022 1 B A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2022 1 B A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2022 1 B A 72 8.000 8.00 Courier fee. Nelson, Eric L Fice L Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2022 1 B A 72 8.000	2998 0001	11/21/2018	1	Α	72	8.000	8.00		ARCH
2998.0001	2550.0001	11/21/2010		• •				Nelson, Eric L.	
Nelson, Eric L 2998.0001 03/12/2019 1 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 03/15/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L 2998.0001 07/30/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L 2998.0001 07/30/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L 2998.0001 08/02/2019 1 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 08/07/2019 1 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 08/07/2019 1 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 12/02/2019 1 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 12/02/2019 1 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 12/10/2019 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 12/10/2019 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/14/2020 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 01/14/2020 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2021 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2021 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 04/23/2021 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/02/2022 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/02/2022 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/02/2022 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/02/2022 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/02/2022 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2998.0001 02/02/2022 18 A 72 8.000 8.00 Courier fee. Nelson Nevada Trust dated May 30, 2001 2008.0001 02/02/2022 18 A 72 8.000 8.00 Courier fee. Nelson Nevad								Eric L. Nelson Nevada Trust dated May 30, 2001	
Fire L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson. Fire L. Nelson Nevada Trust dated May 30, 2001 ARCH Nelson	2998.0001	11/26/2018	1	Α	72	8.000	8.00		ARCH
2998.0001 03/12/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Fric L Fric L Nelson Nevada Trust dated May 30, 2001 RCL Nelson, Fric L Nelson, Nevada Trust dated May 30, 2001 RCL Nelson, Fric L Nelson, Nevada Trust dated May 30, 2001 RCL Nelson, Fric L Nelson, Nevada Trust dated May 3									
2998.0001 03/15/2019 1 A 72 8.000 8.00 Courier fee Nelson, Eric L Nelson Nevada Trust dated May 30, 2001							0.00		ARCH
Eric L Nelson Nevada Trust dated May 30, 2001 ARCH Nelson, Eric L Nelson Nevada Trust date	2998.0001	03/12/2019	1	Α	/2	8.000	8.00		Alten
2998.0001 03/15/2019 1 A 72 8.000 8.00 Courier fee. Nelson, Eric L									
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	Total for Tcode 77	2				Billable	296.00	Courier fee.	

Date: (1/20/19 Time: 9AM)	Secretary: GREITA Attorney: JP
File No. 2779-0401 Client Name: A/CA	(SOA) Matter:
☐ U.S. Bankruptey Court - Deadline is 4 ☐ Justice Court - Deadline is 5:00 p.m. (☐ Paghth Judicial Court - Deadline is 5:0 ☐ Nevada Supreme Court Drop Box - De ☐ Family Court - Deadline is 5:00 p.m. (☐ County Recorder - Deadline is 5:00 p.m. (☐ Probate - Deadline is 4:45 p.m. (Phoe	00 p.m. (200 Lewis Avenue) cadline is 5:00 p.m. (200 Lewis Street) (501 South Pecos)
(Rhonall Forsberg	-109 N. POCOS ROL 4500
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File No. 2978 HOL Client Name: 144	W/A Mother
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15 atte. 17	Secretary: GRETTA Attorney:
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Date: 7/12/17 Time: AM	Secretary: RLG Attorney: SPL lson Matter: Nelson/Klabacka
File No. <u>2998.</u> / Client Name: <u>N</u> 2	Ison Matter: Nelson/Klabacka
 U.S. District Court – Deadline is 4:00 p.m. U.S. Bankruptcy Court – Deadline is 4:00 ☐ Justice Court – Deadline is 5:00 p.m. (20 ☐ Eighth Judicial Court – Deadline is 5:00 ☐ Family Court – Deadline is 5:00 p.m. (6 ☐ County Recorder – Deadline is 5:00 p.m. ☐ Other: Probate - 330 S. Third Street, 10th Floor 	m. (Federal Bldg. – 333 LV Blvd. South) 0 p.m. (Bankruptcy Bldg. – LV and Bndger) 0 South 3rd Street) 0 p.m. (200 Lewis Avenue) 101 South Pecos) (500 So. Grand Central Pkwy.)
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Date: 3/22/18 Time: 030 am	Secretary: GRETTA Attorney: JPI/BPE
File No. 2196 0001 Client Name: 1	LOON Matter: ELN TRUST D-Calle
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	Secretary: GRETTA Attorney: JP /BPE
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File No 2998 0003 Client Name: Ale 200 p.m. (Federal Bldg. – 333 LV Blvd. South) U.S. District Court – Deadline is 4:00 p.m. (Federal Bldg. – 333 LV Blvd. South) U.S. Bankruptcy Court – Deadline is 4:00 p.m. (Bankruptcy Bldg. – LV and Bridger) Justice Court – Deadline is 5:00 p.m. (200 South 3rd Street) Eighth Judicial Court – Deadline is 5:00 p.m. (200 Lewis Avenue) Nevada Supreme Court Drop Box - Deadline is 5:00 p.m. (200 Lewis Street) Family Court – Deadline is 5:00 p.m. (601 South Pecos) County Recorder – Deadline is 5:00 p.m. (500 So. Grand Central Pkwy.) Probate – Deadline is 4:45 p.m. (Phoenix Building, 330 South Third, Suite 1060) Other:					
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Date:	5/15/18	Time: /45pm	_ Secre	etary: <u>GRETTA</u>	Attorney: JP	LABPE
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Date: 5/17/18 Time: 2pm	Secretary: GRETTA Attorney: JPL BPE			
File No. 2998.0001 Client Name: Nelso	Matter: <u>Divovce</u>			
File No. 2898.0001 Client Name: Nelson Matter: Divorce U.S. District Court – Deadline is 4:00 p.m. (Federal Bldg. – 333 LV Blvd. South) U.S. Bankruptcy Court – Deadline is 4:00 p.m. (Bankruptcy Bldg. – LV and Bridger) Justice Court – Deadline is 5:00 p.m. (200 South 3rd Street) Eighth Judicial Court – Deadline is 5:00 p.m. (200 Lewis Avenue) Nevada Supreme Court Drop Box - Deadline is 5:00 p.m. (200 Lewis Street) Family Court – Deadline is 5:00 p.m. (601 South Pecos) County Recorder – Deadline is 5:00 p.m. (500 So. Grand Central Pkwy.) Probate – Deadline is 4:45 p.m. (Phoenix Building, 330 South Third, Suite 1060) Other:				
☐ If unable to deliver or obtain signature:	Return / Leave Documents			
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Date: 5/22/18 Time: 9a1	Secretary: GRETTA Attorne JP /BPE Nel 2000 Matter: 1000 Matter			
File No. 2998 000 Client Name:	Nelach Matter: MV91			
 □ U.S. Bankruptcy Court – Deadling □ Justice Court – Deadling is 5:00 □ Eighth Judicial Court – Deadling □ Nevada Supreme Court Drop Both □ Family Court – Deadling is 5:00 □ County Recorder – Deadling is 5:00 	e is 5:00 p.m. (200 Lewis Avenue) ox - Deadline is 5:00 p.m. (200 Lewis Street)			
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Documents Attached: Initial opp to MTN Reconstitution Special Instructions: CC Dyl. O				
Please & Thank You!				
Completed by	Date			
T	() 12 - 142 ²²⁹⁹			

Date: 10/14 Time: 930 am	Secretary: GRETTA Attorney: JPL/BPE			
File No. 2998.0001 Client Name: <u>VQ</u>	180V Matter: <u>D-09-44537-D</u>			
U.S. District Court – Deadline is 4:00 p.m. (Federal Bldg. – 333 LV Blvd. South) U.S. Bankruptcy Court – Deadline is 4:00 p.m. (Bankruptcy Bldg. – LV and Bridger) Justice Court – Deadline is 5:00 p.m. (200 South 3rd Street) Eighth Judicial Court – Deadline is 5:00 p.m. (200 Lewis Avenue) Nevada Supreme Court Drop Box - Deadline is 5:00 p.m. (200 Lewis Street) Family Court – Deadline is 5:00 p.m. (601 South Pecos) County Recorder – Deadline is 5:00 p.m. (500 So. Grand Central Pkwy.) Probate – Deadline is 4:45 p.m. (Phoenix Building, 330 South Third, Suite 1060) Other:				
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Special Instructions: CC Dept. Please & Thank You!	Defendants Motion 10			
Completed by	C 19 19 AA2300			

Date:	(0/25/18 Time: 4:75pm	Secre	tary: GRETTA Attorney: JPL/BPE	
File No	2998:000/ Client Name: <i>Nela</i>	ow	Matter: D 09-4//537-D	
Date: (a/25/18 Time: 4/75/M Secretary: GRETTA Attorney: JPL/BPE File No 2998.000/ Client Name: Meloov Matter: D 09.4/1537- U.S. District Court – Deadline is 4:00 p.m. (Federal Bldg. – 333 LV Blvd. South) U.S. Bankruptcy Court – Deadline is 4:00 p.m. (Bankruptcy Bldg. – LV and Bridger) Justice Court – Deadline is 5:00 p.m. (200 South 3rd Street) Eighth Judicial Court – Deadline is 5:00 p.m. (200 Lewis Avenue) Nevada Supreme Court Drop Box – Deadline is 5:00 p.m. (200 Lewis Street) Family Court – Deadline is 5:00 p.m. (601 South Pecos) County Recorder – Deadline is 5:00 p.m. (500 So. Grand Central Pkwy.) Probate – Deadline is 4:45 p.m. (Phoenix Building, 330 South Third, Suite 1060) Other:				
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S-Specia	nents Attached: Jupy to Ly ZZ-18 Online I Instructions: CC Dyt. O & Thank You!		is Motion Reconsiduration	
Comp	leted by	Date	0 R/26 (1201	

Date: 7/10/8 Time: 109M	Secre	tary: GRETTA Attorney: JPL/BPE
File No. 2998.00/ Client Name: NO	80N	Matter: Quonco
 □ U.S. District Court – Deadline is 4:00 p □ U.S. Bankruptcy Court – Deadline is 4:00 p □ Justice Court – Deadline is 5:00 p.m. (2 □ Eighth Judicial Court – Deadline is 5:00 □ Nevada Supreme Court Drop Box - Deadline is 5:00 p.m. (6 □ County Recorder – Deadline is 5:00 p.m. (7 □ Probate – Deadline is 4:45 p.m. (Phoenical Other: 	00 p.m. 00 Sout 0 p.m. (2 adline is 501 Sou n. (500 S ix Build	(Bankruptcy Bldg. – LV and Bridger) th 3rd Street) 200 Lewis Avenue) 5:500 p.m. (200 Lewis Street) th Pecos) So. Grand Central Pkwy.) ling, 330 South Third, Suite 1060)
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Special Instructions: CC Dept. Please & Thank You!)	Lynita Nelsons Motion Manage Lindell
Completed by	Date	AA2302

Date: 7/1/18 Time: 10 00 97	Secre	tary: GRETTA Attorney JPI/BPE Matter: Divord
File No. 2998.000/ Client Name: //el	DON	Matter: Divorce
☐ U.S. District Court — Deadline is 4:00 p. U.S. Bankruptcy Court — Deadline is 4 ☐ Justice Court — Deadline is 5:00 p.m. (☐ Eighth Judicial Court — Deadline is 5:00 p.m. (☐ Nevada Supreme Court Drop Box - Deadline is 5:00 p.m. (☐ County Recorder — Deadline is 5:00 p.m. (☐ Probate — Deadline is 4:45 p.m. (Phoen ☐ Other:	p.m. (Fereico) p.m. (200 p.m. (200 Sou)0 p.m. (200 sou)0 p.m. (200 sou)0 p.m. (500 m. (500 p.m. (500 p.	deral Bldg. – 333 LV Blvd. South) (Bankruptcy Bldg. – LV and Bridger) th 3rd Street) 200 Lewis Avenue) 5 5:00 p.m. (200 Lewis Street) th Pecos) So. Grand Central Pkwy.)
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Documents Attached: Notice of Special Instructions:))	other to Opp.

Date: 3/23/18 Time: 4W Mus	Secretary: Vanussa Attorney: 5PL
File No. 2998. 1 Client Name: NCLSC	Matter: EVIC NUSON NWadciTrust
U.S. District Court - Deadline is 4:00 p.m. (U.S. Bankruptcy Court - Deadline is 4:00 p.m. (Eighth Judicial Court - Deadline is 5:00 p.m. (Justice Court - Deadline is 5:00 p.m. (200 L.) Family Court - Deadline is 5:00 p.m. (601 S.) Probate Court - Deadline is 5:00 p.m. (330 S.) County Recorder - Deadline is 5:00 p.m. (50.) Bank of Nevada - 8505 W. Centennial Parky Other Dickerson Karacson 1745 Village LV NV BAISL	Federal Bldg. – 333 LV Blvd. South) m. (Bankruptcy Bldg. – LV and Bridger) n. (200 Lewis Avenue) ewis Avenue) south Pecos) S. 3 rd Street, 10 th Floor) 90 So. Grand Central Pkwy.) way, Las Vegas, Nevada 89149 Yi Law Gwoup Color Circle turn / Leave Documents
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Thank you!



Date: 817818 Time: AW (UNS	Secretary: <u>VUUU</u> S Q. Attorney: <u>TP</u> ^Matter: <u>EVIC NELSON MEU</u> ACKT
U.S. District Court – Deadline is 4:00 p.m. U.S. Bankruptcy Court – Deadline is 4:00 p.m. Eighth Judicial Court – Deadline is 5:00 p.m. Justice Court – Deadline is 5:00 p.m. (2001) Family Court – Deadline is 5:00 p.m. (601) Probate Court - Deadline is 5:00 p.m. (330) County Recorder – Deadline is 5:00 p.m. (500) Bank of Nevada - 8505 W. Centennial Park	(Federal Bldg. – 333 LV Blvd. South) o.m. (Bankruptcy Bldg. – LV and Bridger) n. (200 Lewis Avenue) Lewis Avenue) South Pecos) S. 3 rd Street, 10 th Floor) 500 So. Grand Central Pkwy.)
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3 22 18 AA2305

Date:	11/21 Time: 991	Secretary: <u>GRETTA</u> Attorney: <u>JPD/BPE</u>
File N	10.2998.000 Client Name: N	Secretary: GRETTA Attorney JPD/BPE Matter: D-09-4/1537-D
	Justice Court – Deadline is 5:00 p.m Eighth Judicial Court – Deadline is Probate – Deadline is 4:45 p.m. (Phr Family Court – Deadline is 5:00 p.m County Recorder – Deadline is 5:00 County Recorder – Deadline is 5:00 U.S. District Court – Deadline is 4:0 U.S. Bankruptcy Court – Deadline is Nevada Supreme Court Drop Box –	m. (200 South 3rd Street) 5:00 p.m. (200 Lewis Avenue) neemix Building, 330 South Third, Suite 1060) m. (601 South Pecos) 0 p.m. (500 So. Grand Central Pkwy.) 0 p.m. Closed Friday (3211 N. Tenaya Way #118) 00 p.m. (Federal Bldg. – 333 LV Blvd. South) is 4:00 p.m. (Bankruptcy Bldg. – LV and Bridger) Deadline is 5:00 p.m. (200 Lewis Street)
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Comi	bleted by	Date 2112 AA2306

No o	U.S. District Court – Deadline is 4:0 U.S. Bankruptcy Court – Deadline is Justice Court – Deadline is 5:00 p.m Eighth Judicial Court – Deadline is 5 Nevada Supreme Court Drop Box - I Family Court – Deadline is 5:00 p.m County Recorder – Deadline is 5:00 Probate – Deadline is 4:45 p.m. (Pho	4:00 p.m. . (200 Sou 5:00 p.m. (Deadline is . (601 Sou p.m. (500	(Bankruptcy Bldg. – LV and Bridger) th 3rd Street) 200 Lewis Avenue) s 5:00 p.m. (200 Lewis Street) th Pecos) So. Grand Central Pkwy.)
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Date:	7/30/19 Time: 12 pm	Secretary: GRETTA Attorney JPI/BPE	
File No	. 2998.0001 Client Name: NOLS	ON Matter: 10-09-41/537.0	<u>*</u> :
	U.S. Bankruptcy Court – Deadline is 4:0 Justice Court – Deadline is 5:00 p.m. (20 Eighth Judicial Court – Deadline is 5: Nevada Supreme Court Drop Box - Dead Family Court – Deadline is 5:00 p.m. (60 County Recorder – Deadline is 5:00 p.m.	00 p.m. (200 Lewis Avenue) dline is 5:00 p.m. (200 Lewis Street) 01 South Pecos)	
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	Thank I've	Date	

	Secretary: GRETTA Attorney: JPD/BPE
File No. 2998.000 Client Name: Nelson	Matter: D-09-4/1537-D
☐ U.S. District Court – Deadline is 4:00 p.m. ☐ U.S. Bankruptcy Court – Deadline is 4:00 ☐ Justice Court – Deadline is 5:00 p.m. (20) ☐ Eighth Judicial Court – Deadline is 5:00 ☐ Nevada Supreme Court Drop Box - Dead ☐ Family Court – Deadline is 5:00 p.m. (60) ☐ Courty Recorder – Deadline is 5:00 p.m.	m. (Federal Bldg. – 333 LV Blvd. South) 0 p.m. (Bankruptcy Bldg. – LV and Bridger) 00 South 3rd Street) 00 p.m. (200 Lewis Avenue) dline is 5:00 p.m. (200 Lewis Street) 01 South Pecos)
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Documents Attached: S/2 auth (Special Instructions: Reck Up Me) Please & Thank You! Completed by	noy stick. TH. Date AA2309

Date:	8/7/19 Time: 1030	Secre	tary: GRETTA Attorney: JPLBPE
Ed. Ni	0. 298.0001 Client Name: NUL	Line	Matter D 09-4//537-10
000000000000000000000000000000000000000	U.S. District Court – Deadline is 4:00 p.i. U.S. Bankruptcy Court – Deadline is 4:0 Justice Court – Deadline is 5:00 p.m. (20 Eighth Judicial Court – Deadline is 5:1 Nevada Supreme Court Drop Box - Dead Family Court – Deadline is 5:00 p.m. (60 County Recorder – Deadline is 5:00 p.m. Probate – Deadline is 4:45 p.m. (Phoen Other:	n. (Fed 0 p.m. 0 Sout 90 p.m Illine is 01 Sout (500)	deral Bldg. – 333 LV Blvd. South) (Bankruptcy Bldg. – LV and Bridger) th 3rd Street) 1. (200 Lewis Avenue) 15:00 p.m. (200 Lewis Street) th Pecos) So. Grand Central Pkwy.)
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Specia	ments Attached: Journal - al Instructions: Instructions: CC Judge Sull; & Thank You!		7115 Cref in Respor-
Comp	leted by	Date	AA2310

X	Eighth Judicial Court – Deadline is Nevada Supreme Court- Deadline is Family Court – Deadline is 5:00 p.m County Recorder – Deadline is 5:00 Probate – Deadline is 4:45 p.m. (Pl Other:	5:00 p.m. . (601 Sor p.m. (500	. (408 East Clark Ave.) uth Pecos)
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Date	2/10/19 Time: MARI	\mathbb{P}_{secr}	etary: <u>GRETTA</u> Attorney: <u>JPDBPE</u>
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File	No. 2998.000 Client Name: NO	L NOV	Matter:
	U.S. District Court – Deadline is 4:00	p.m. (Fe	ederal Bldg. – 333 LV Blvd. South
	U.S. Bankruptcy Court - Deadline is	4:00 p.m	. (Bankruptcy Bldg. – LV and Bridger)
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			nilding, 330 South Third, Suite 1060)
×	Other: Nelson+ ASSOC.	-3611	5. Lindell. Rd #201
215			
***		. J. James & S. J. Lawer .	
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EXHIBIT 10

EXHIBIT 10

Date: 12/09/2022

Detail Cost Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date		Tcode/	Rate	Amount	Ref #
Tcode 56 (miscell 2998.0001	daneous expens 05/15/2018	e) 1 A	56		12.00 Hearing Video (Eighth Judicial District Court). Nelson, Eric L.	ARCH
2998.0001	08/16/2021	18 A	A 56		Eric L. Nelson Nevada Trust dated May 30, 2001 2.00 Obtain CD of hearing video Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001	ARCH
Total for Tcode 5	6			Billable	14.00 (miscellaneous expense)	

Page: 9

From: Sent: Tuesday, May 15, 2018 10:52 AM To: Mia Williams Subject: Attachments: Petty Cash Request 2018-05-15 CDROM VIDEOTAPE MEMORY STICK ORDER 01-31-18 hearing, 4813-361....pdf

SOLOMON DWIGGINS & FREER

/ / REG. ACCT. / / TRUST ACCT.	/XXX/ PETTY CASH
Payee: EIGHTH JUDICIAL DISTRICT COURT	Amount \$12.00
Purpose: 01/31/18 HEARING VIDEO	
Charge: / / Firm /XX/ Client: Nelson, Eric File No. 2998 / / Client: File No.	3.0001
Matter:	
Send to: Gretta	
Other instructions:	
Signature	Date May 15, 2018
Posted to Client Account on:	

Gretta McCall, Legal Assistant to

Brian P. Eagan, Esq. and Jeffrey P. Luszeck, Esq.

SOLOMON DWIGGINS & FREER, LTD.

Cheyenne West Professional Center | 9060 W. Cheyenne Avenue | Las Vegas, NV 89129

Direct: 702.589.3519 | Office: 702.853.5483 |

Facsimile: 702.853.5485

Email: <u>amccall@sdfnvlaw.com</u> | Website: <u>www.sdfnvlaw.com</u>

www.facebook.com/sdfnvlaw www.linkedin.com/company/solomon-dwiggins-&-freer-ltd-

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AA2321

OFFICIAL RECEIPT

Office of the County Clerk Clark County Family Court 601 North Pecos Rd Las Vegas, NV 89101

Payor Solomon, Mark Alan 9060 W Cheyenne AVE Las Vegas, NV 89129 Receipt No. 2018-14148-FAM

Transaction Date 05/15/2018

Description			Amount Paid
Solomon, Mark Alan D-09-411537-D			
Eric L Nelson, Płaintiff vs. Lynita Nelson, D TVS Hearings (Mer			12.00
SUBTOTAL			12.00
Remaining Balance	Due: \$0.00		
		PAYMENT TOTAL	12.00
		Cash Tendered	12.00
		Total Tendered	12.00
		Change	0,00
05/15/2018	Cashier	Audit	
03:29 PM	Station FC05	36157958	

OFFICIAL RECEIPT

CLIENT FILE COPY

SOLOMON DWIGGINS & FREER

// REG. ACCI. // IROSTACCI. // FEITI CASH	L
PAYEE: Transcript Video Services AMOUNT: \$2.00	
PURPOSE: Obtain CD of hearing video	
CHARGE: // FIRM /x/ CLIENT: 2998.0001	
MATTER: Nelson v. Nelson	
SEND TO: ATC	
OTHER INSTRUCTIONS:	
SIGNATURE	DATE August 13, 2021
POSTED TO CLIENT ACCOUNT ON:	

CHIEFED ON 8/49/

REPRINTED RECEIPT

District Court Clerk of the Court 200 Lewis Ave, 3rd Floor Las Vegas, NV 89101

Payor Solomon, Mark Alan Solomon Dwiggins Freer & Steadman Ltd Attn: Mark Alan Solomon, Esq			20	Receipt No. 121-50847-CCCLK
9060 W. Cheyenne Ave Las Vegas, NV 89129	5q			Transaction Date 08/16/2021
Description				Amount Paid
Solomon, Mark Alan D-09-411537-D Eric L Nelson, Plai	ntiff vs. Lynita Nelson, I TVS Hearings (CE SUBTOTAL Remaining Baland)-ROM or VHS)	_	2.00 2.00
			PAYMENT TOTAL	2.00
			Cash Tendered Total Tendered Change	2.00 2.00 0.00
	08/16/2021 12:32 PM	Cashier Station EFILE	Audit 37916332	

REPRINTED RECEIPT

Date: 12/09/2022

Detail Cost Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Trans H Tcode/ Ref# Tkpr P Task Code Rate Amount Client Date Tcode 77 Transcription fees. ARCH 352.00 Transcription fees. 77 2998.0001 09/16/2021 18 A Nelson, Eric L. Eric L. Nelson Nevada Trust dated May 30, 2001 Billable 352.00 Transcription fees. **Total for Tcode 77**

Page: 33

COPY

EIGHTH JUDICIAL DISTRICT COURT

1

2

FILED

FAMILY DIVISION

SEP 2 2 2021

Marine A. Spinner

3	CLARK COUNTY, NEVADA CLERK OF COURT
4	
5	ERIC L. NELSON,) CASE NO. D-09-411537-D Plaintiff,) DEPT. G
6)) NV SUPREME CT. APPEAL NO.
7) 66772; 68292; 77473 LYNITA NELSON,)
8	Defendant.) SEALED
9	FINAL BILLING FOR TRANSCRIPTS
10	The office of Transcript Video Services filed transcript
11	for Alexandrea Carnival on September 22, 2021 for the following proceedings in the above-captioned case:
12	August 04, 2021
13	Original transcript and one copy were requested:
14	The transcript total is 79 pages, for a final cost of \$413.60. A deposit in the amount of \$352.00 was received on
15	September 16, 2021. The balance of \$61.60 was paid on September 22, 2021 directly to Verbatim Reporting and Transcription.
16	DATED this 22 nd day of September, 2021
17	Marini bullarlas
18	Maria Balagtas, Legal Office Assistant II
19	Transcription Video Services
20	Balance of Paid in Full Check # CC#_20-1596 CASH21-1810 CLERK
21	No. 1 Cath Samuel
22	Received by: Atexandra Carnival this 29th day of September 2021.
23	ITEMS LEFT BEYOND NINETY DAYS ARE SUBJECT TO DISPOSAL WITHOUT REFUND. COUNTY RETENTION POLICY APPROVED BY INTERNAL AUDIT
24	
25	

EIGHTH JUDICIAL DISTRICT COURT - TRANSCRIPT VIDEO SERVICES 601 N. Pecos Road, Las Vegas, Nevada 89101 (702) 455-4977

,			Electronically Filed 2/9/2023 9:44 PM Steven D. Grierson CLERK OF THE COURT			
$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	MOT THE DICKERSON KARACSONYI LA	W GROUP	Otimo P. Som			
3	ROBERT P. DICKERSON, ESQ. Nevada Bar No. 000945					
4	JOSEF M. KARACSONYI, ESQ. Nevada Bar No. 010634					
5	NATALIE E. KARACSONYI, ESQ.					
6	1645 Village Center Circle, Suite 291 Las Vegas, Nevada 89134					
7	Nevada Bar No. 010379 1645 Village Center Circle, Suite 291 Las Vegas, Nevada 89134 Telephone: (702) 388-8600 Facsimile: (702) 388-0210 Email: info@thedklawgroup.com Attorneys for Lynita S. Nelson					
8	Email: <u>info@thedklawgroup.com</u> Attorneys for Lynita S. Nelson					
9	EIGHTH JUDICIAL DISTRICT COURT FAMILY DIVISION					
10						
11	CLARK COUNTY	, NEVADA				
12	ERIC L. NELSON,	CASE NO.:	D-09-411537-D O			
13	Plaintiff/Counterdefendant,) DEPT NO.:)	O			
14	v.)				
15	LYNITA SUE NELSON, MATT KLABACKA, as Distribution Trustee of the ERIC L. NELSON NEVADA	NO ORAL	ARGUMENT			
16	of the ERIC L. NELSON NEVADA TRUST dated May 30, 2001,	REQUESTE }	:D			
17	Defendants/Counterclaimants.	}				
18	MATT KLABACKA, as Distribution)				
19	Trustee of the ERIC L. NELSON NEVADA TRUST dated May 30,	}				
20	2001,	{				
21	Crossclaimant,	{				
22	V.	{				
23	LYNITA SUE NELSON, Individually and as Investment Trustee of the LSN NEVADA TRUST, dated May 30,	{				
24	$\ 2001$, and ERIC NELSON,	{				
25	Trustee of the ERIC L. NELSON	{				
26	NEVADA TRUST dated May 30, 2001,	{				
27	Cross-Defendants.	{				
28		,				

AA2327

NOTICE: YOU MAY FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK OF THE COURT AND PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING CRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE 2 GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE. 5 6 DEFENDANT, LYNITA S. NELSON'S, MOTION TO RETAX COSTS 7 COMES NOW, Defendant, LYNITA SUE NELSON ("Lynita"), by 8 and through her attorneys, ROBERT P. DICKERSON, ESQ., JOSEF M. KARACSONYI, ESQ., and NATALIE E. KARACSONYI, ESQ., of THE 10 DICKERSON KARACSONYI LAW GROUP, and does hereby submit her 11 Specifically, Lynita respectfully Motion to Retax Costs ("Motion"). 12 requests the Court deny Plaintiff, ERIC L. NELSON ("Eric"), and 13 Defendant/Cross-Claimant, MATT KLABACKA, as Distribution Trustee 14 of the ERIC L. NELSON NEVADA TRUST dated May 30, 2001 ("ELN 15 Trust"), the costs set forth in their respective Verified Memorandum of 16 Costs filed on February 6, 2023. 17 This Motion is made and based upon the pleadings and papers on file 18 herein, and the Memorandum of Points and Authorities attached hereto. 19 DATED this 9th day of February, 2023 20 THE DICKERSON KARACSONYI 21 LAW GROUP 22 By /s/ Josef Karacsonyi
ROBERT P. DICKERSON, ESQ 23 Nevada Bar No. 000945 24JOSEF M. KARACSONYI, ESQ. Nevada Bar No. 010634 NATALIE E. KARACSONYI, ESQ. Nevada Bar No. 010579 25 26 1645 Village Center Circle, Suite 291 Las Vegas, Nevada 89134 Attorneys for Lynita S. Nelson 27

28

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL STATEMENT

On January 31, 2023, the Court entered its (1) Decision Regarding the Characterization of Management Fees, and (2) Decision Denying Plaintiff's Motion to Correct, Clarify, Alter, or Amend, and Denying Defendant's Motion to Correct, Clarify, and/or Reconsider. On February 6, 2023, Eric and ELN Trust each filed a Verified Memorandum of Costs stating (in both filings), "Pursuant to NRS 18.005 and 18.020, certain reasonable and necessary costs are allowed as a matter of course to the prevailing parties."

II. LEGAL ANALYSIS

A. There Is No Right To Costs "As A Matter Of Course" In Divorce Actions

Eric and ELN Trust cite to NRS 18.005 and 18.020 in support of their requests for costs, and represent that pursuant to such statutes they are entitled to costs "as a matter of course." Said statutes do not allow for any costs in this case. NRS 18.005 simply defines "costs" "[f]or the purposes of NRS 18.010 to 18.150," and does not provide when costs are allowed. NRS 18.020 sets forth the cases in which costs are allowed to a prevailing party, and does not provide for an award of costs in a divorce action:

NRS 18.020 Cases in which costs allowed prevailing party. Costs must be allowed of course to the prevailing party against any adverse party against whom judgment is rendered, in the following cases:

- 1. In an action for the recovery of real property or a possessory right thereto.
- 2. In an action to recover the possession of personal property, where the value of the property amounts to more than \$2,500. The value must be determined by the jury, court or master by whom the action is tried.

- 3. In an action for the recovery of money or damages, where the plaintiff seeks to recover more than \$2,500.
- 4. In a special proceeding, except a special proceeding conducted pursuant to NRS 306.040.
- 5. In an action which involves the title or boundaries of real estate, or the legality of any tax, impost, assessment, toll or municipal fine, including the costs accrued in the action if originally commenced in a Justice Court.

As can be seen, NRS 18.020 does not allow for an award of costs in an action commenced pursuant to NRS Chapter 125 (i.e., actions for divorce and separate maintenance), nor in actions pertaining to child custody and support. It would be against the public policy and laws of the State of Nevada to allow for an award of costs as a matter of course in a divorce action.

First, NRS 125.150(1)(b) requires the Court in a divorce action to adjudicate the community property rights of the parties, including any property transferred to an irrevocable trust. In its 2017 decision, the Supreme Court held that this Court must conduct a tracing to determine whether any community property exists within ELN Trust or LSN Trust:

Eric's Trust retained a certified public accountant to prepare a report tracing the assets within the two trusts. However, as noted by the district court, the certified public accountant maintained a business relationship with Eric and Eric's Trust

1. In granting a divorce, the court:

(b) Shall, to the extent practicable, make an equal disposition of the community property of the parties, including, without limitation, any community property transferred into an irrevocable trust pursuant to NRS 123.125 over which the court acquires jurisdiction pursuant to NRS 164.010, except that the court may make an unequal disposition of the community property in such proportions as it deems just if the court finds a compelling reason to do so and sets forth in writing the reasons for making the unequal disposition.

¹ NRS 125.150(1)(b) provides:

for more than a decade. Although the certified public accountant's report concluded that there was "no evidence that any community property was transferred to [Eric's Trust] or that any community property was commingled with the assets of [Eric's Trust]," the district court found the report and corresponding testimony to be unreliable and of little probative value. We recognize that the district court is in the best position to weigh the credibility of witnesses, and we will not substitute our judgment for that of the district court here. See In re Parental Rights as to J.D.N., 128 Nev. 462, 477, 283 P.3d 842, 852 (2012). However, the subject of the certified public accountant's report—the tracing of trust assets, specifically any potential commingling of trust assets with personal assets—must still be performed. See Schmanski v. Schmanski, 115 Nev. 247, 984 P.2d 752 (1999) (discussing transmutation of separate property and tracing trust assets in divorce). Without proper tracing, the district court is left with only the parties' testimony regarding the characterization of the property, which carries no weight. See Peters v. Peters, 92 Nev. 687, 692, 557 P.2d 713, 716 (1976) ("The opinion of either spouse as to whether property is separate or community is of no weight [whatsoever]."). Accordingly, we conclude the district court erred by not tracing the assets contained within the trusts, either through a reliable expert or other available means. Separate property contained within the spendthrift trusts is not subject to attachment or execution, as discussed below. However, if community property exists within the trusts, the district court shall make an equal distribution of that community property. See NRS 125:150(1)(b).

Klabacka v. Nelson, 133 Nev. 164, 394 P.3d 940. 948 (2017). As the Supreme Court further explained in its Opinion granting writ petition entered on April 1, 2021, "[w]e also recognized assets within the trusts may contain community property and remanded the case so that the district court could conduct a proper tracing of the trust assets to determine whether any community property was transferred into or commingled within the trusts." Nelson v. Eighth Jud. Dist. Ct., 137 Nev. Adv. Op. 14, 484 P.3d 270, 274-75 (2021).

Even in divorce cases where default is entered, the Court must still trace and divide property pursuant to NRS 125.150(1)(b), and make independent findings supporting the division of property in accordance with the law. *Blanco v. Blanco*, 129 Nev. 723, 311 P.3d 1170, 1175-76 (2013). Accordingly, when the court traces and makes findings regarding

the character of property in a divorce, including properties transferred to irrevocable trusts, there is no "prevailing party" as the task must be performed in every case. To allow an award of costs to allegedly prevailing parties in the division of property in a divorce action would have a stifling effect on parties' abilities to pursue their rights to property, which cannot be permitted. Parties should not fear an award of costs against them simply for pursuing an adjudication of their property rights pursuant to NRS 125.150(1)(b).

Second, there are specific statutes that govern the award of attorneys' fees and costs in divorce actions. Specifically, NRS 125.040 allows parties to a divorce to request moneys necessary to carry on or defend the suit. NRS 125.150(4) provides: "4. Except as otherwise provided in NRS 125.141, whether or not application for suit money has been made under the provisions of NRS 125.040, the court may award a reasonable attorney's fee to either party to an action for divorce." In order for a court to award fees and costs pursuant to these statutes, it must consider and make findings regarding the financial condition and disparity in income of the parties to ensure equal access to the courtroom. Sargeant v. Sargeant, 88 Nev. 223, 227, 495 P.2d 618, 621 (1972); see also Wright v. Osburn, 114 Nev. 1367, 1370, 970 P.2d 1071, 1073 (1998) ("The disparity in income is also a factor to be considered in the award of attorney fees.").

For the foregoing reasons, Eric and ELN Trust are not entitled to an award of costs.

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² NRS 125.141 allows a party to make an offer to allow decree concerning property rights to potentially recover costs and reasonable attorney's fees, and to prohibit the other party from recovering costs and attorney's fees, if the party who rejects the offer does not obtain a more favorable property division at trial. However, no such offer was made in this case.

B. Eric And ELN Trust Have Failed To Support Their Requests For Costs By Filing A Financial Disclosure Form

While any further analysis is unnecessary, Lynita is compelled to point out that Eric and ELN Trust did not properly support their requests for costs with the filing of a General Financial Disclosure Form ("FDF"). An FDF is required to be filed in support of any request for monies pursuant to Eighth Judicial District Court Rules, Rule 5.507 (2023). Without an FDF, the Court cannot make the necessary findings regarding the parties' relative financial circumstances and disparity in income to support an award of attorneys' fees or costs.

C. Certain Costs Claimed By ELN Trust Are Not Supported Pursuant To NRS 18.005

Again, although the Court does not need to reach the issue, certain costs claimed by ELN Trust are not properly supported pursuant to NRS 18.005. NRS 18.005(5) (which is not applicable in this case for the reasons already stated) allows for "[r]easonable fees of not more than five expert witnesses in an amount of not more than \$1,500 for each witness, unless the court allows a larger fee after determining that the circumstances surrounding the expert's testimony were of such necessity as to require the larger fee." ELN Trust requests expert fees of \$47,461.86 without asserting any reasons or argument as to why the \$1,500 limit in NRS 18.005(5) should be exceeded in this case.

NRS 18.005(17) allows for "reasonable and necessary expenses for computerized services for legal research." ELN Trust requests the exorbitant sum of \$21,995.75 for Westlaw Legal Research charges. The State Bar of Nevada offers all active bar members free electronic access to Fastcase, which "includes access to federal and Nevada caselaw, local federal rules, reporters, links to court forms, Attorney General's opinions,

bankruptcy decisions, administrative regulations and other information important to state bar members." For only \$195 more per year, a State Bar of Nevada member can obtain access to primary law from all fifty (50) states and federal databases, including federal district courts and bankruptcy court. Given the heavily discounted legal research database provided to State Bar of Nevada members, the Court cannot find that approximately \$22,000 in Westlaw charges are reasonable or necessary. Indeed, Lynita has not been charged any cost by her attorneys for computerized services for legal research.

III. CONCLUSION

Based on the foregoing, Lynita respectfully requests the Court deny to Eric and ELN Trust the costs set forth in their respective Verified Memorandum of Costs filed on February 6, 2023.

DATED this 9th day of February, 2023.

THE DICKERSON KARACSONYI LAW GROUP

By /s/ Josef Karacsonyi
ROBERT P. DICKERSON, ESQ
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Las Vegas, Nevada 89134
Attorneys for Lynita S. Nelson

https://nvbar.org/for-lawyers/resources/fastcase-2/ (last visited February 9, 2023).

CERTIFICATE OF SERVICE

- 1					
2	Pursuant to NRCP 5(b), I certify that I am an employee of THE				
3	DICKERSON KARACSONYI LAW GROUP, and that on this 9th day of				
4	February,	2023, I caused the above and foregoing document entitled			
5	DEFEND	ANT, LYNITA S. NELSON'S, MOTION TO RETAX COSTS,			
6	to be serve	ed as follows:			
7	[X]	by mandatory electronic service through the Eighth Judicial District Court's electronic filing system;			
8	[]	by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;			
10 11	[]	to be sent via facsimile, by duly executed consent for service by electronic means;			
12	[]	by hand-delivery with signed Receipt of Copy.			
13	To the person(s) and/or attorney(s) listed below at the address, emai				
14	address, and/or facsimile number indicated below:				
15 16 17	MICHELLE HAUSER, ESQ. JONES & LOBELLO 9950 W. Flamingo Road, Suite 100 Las Vegas, Nevada 89147 hauser@joneslobello.com Attorneys for Plaintiff, Eric L. Nelson				
18 19	MICHAEL P. CARMAN, ESQ. FINE CARMAN PRICE				
20	8965 S. Pecos Rd., Suite 9				
21	Henderson, Nevada 89047 mike @fcpfamilylaw.com Attorneys for Plaintiff, Eric L. Nelson				
22	JEFFREY	P. LUSZECK, ESQ.			
23	JEFFREY P. LUSZECK, ESQ. SOLOMON, DWIGGINS, FREER & STEADMAN, LTD. 9060 W. Cheyenne Avenue Las Vegas, Nevada 89129				
24	Las Vegas, Nevada 89129 jluszeck@sdfnylaw.com Attorneys for MATT KLABACKA, as Distribution Trustee of the ERIC L NELSON NEVADA TRUST dated May 30, 2001				
2526	INDESOLV	141 111011 111001 duted 11111y 00, 2001			
27		/s/ Josef Karacsonyi An employee of The Dickerson Karacsonyi Law Group			
41	ll .	Y			

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Electronically Filed 2/21/2023 1:09 PM Steven D. Grierson CLERK OF THE COURT

MOT 1 JONES & LOBELLO 2 Michelle A. Hauser, Esq. Nevada State Bar No. 7738 3 9950 W. Flamingo Road, #100 4 Las Vegas, Nevada 89147 Phone: 702-318-5060 5 Email: hauser@joneslobello.com 6 CARMAN & PRICE 7 Michael P. Carman, Esq. Nevada State Bar Number 07639 8 8965 South Pecos Road, Suite 9A Henderson, Nevada 89074 10 Telephone: (702) 476-6440 Attorneys for Plaintiff, 11 **ERIC NELSON** 12 Individually DISTRICT COURT 13 9950 W. Flamingo Road, #100 Las Vegas, Nevada 89147 702-318-5060 FAX: 702-318-5070 FAMILY DIVISION ONES & LOBELLO CLARK COUNTY, NEVADA 14 15 ERIC L. NELSON, 16 Plaintiff 17 VS. 18 NELSON, MATT Case No.: D-09-411537-D LYNITA SUE KLABACKA, as Distribution Trustee 19 Dept. No.: O of the ERIC L. NELSON NEVADA 20 Oral Argument Requested: Yes TRUST dated May 30, 2001, 21 Defendants. 22 Distribution 23 KLABACKA, MATT Trustee of the ERIC L. NESLON 24 NEVADA TRUST dated May 30, 2001, 25 Cross-claimant, VS. 26 27 LYNITA SUE NELSON, Cross-defendant. 28

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NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN FOURTEEN (14) DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE.

ERIC NELSON'S, IN HIS INDIVIDUAL CAPACITY, MOTION FOR ATTORNEY'S FEES

COMES NOW, Plaintiff, Eric Nelson, *Individually*, (hereinafter "Eric"), by and through his attorneys, Michelle A. Hauser, Esq., of the law firm of JONES & LOBELLO, and Michael P. Carman, Esq., of the firm of CARMAN & PRICE and hereby files his *MOTION ATTORNEY'S FEES* (the "Motion").

This Motion is made and based upon the pleadings and papers on file in this matter, the Memorandum of Points and Authorities, and any oral argument that this Court may entertain at the time of the hearing.

DATED this day of 21st, February, 2023.

JONES & LOBELLO

/s/ Michelle A. Hauser
Michelle A. Hauser, Esq.
Nevada State Bar No. 7738
9950 W. Flamingo Road, #100
Las Vegas, Nevada 89147
Attorneys for Plaintiff,
Eric Nelson
Individually

JONES & LOBELLO 9950 W. Flamingo Road, #100 Las Vegas, Nevada 89147 702-318-5060 FAX: 702-318-5070

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MEMORANDUM OF POINTS AND AUTHORITIES

I. RELEVANT FACTS.

Eric ("Eric") and Lynita ("Lynita") Nelson (hereinafter collectively referred to as "Nelsons") were married on September 17, 1983.

In 1993, the Nelsons entered into a valid separate property agreement (the "SPA") which transmuted their community property into each parties' respective separate property.

The property equally divided by the SPA contemporaneously funded each Parties' 1993 separate property trust. Eric's Separate Property Trust is hereinafter referred to as "Eric's SPT", and Lynita's Separate Property Trust is hereinafter referred to as "Lynita's SPT".

In 2001, the Nelsons converted each of their respective 1993 separate property trusts into valid self-settled spendthrift trust – respectively, the Eric L. Nelson Nevada Trust ("ELN Trust") and the Lynita S. Nelson Nevada Trust ("LSN Trust") (collectively, the "Trusts").

On May 6, 2009, Eric filed his Complaint for Divorce in the instant matter.

On June 24, 2011, Eric filed a motion seeking to join the ELN Trust as a necessary party to the divorce action.

On June 3, 2013, over five years after the original Complaint for Divorce was filed, a Decree of Divorce ("Decree") was entered by the District Court after

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multiple trials and hearings on the matter. After the entry of the Decree, ELN Trust filed a Notice of Appeal to the Nevada Supreme Court on October 20, 2014.

On May 25, 2017, the Nevada Supreme Court issued its Decision. As it relates to the pending issues before the District Court, the Nevada Supreme Court held:

Both the [separate property agreement] and the parties' respective SSSTs were signed, written agreements. We hold the written instruments at issue here are all valid and the terms therein are unambiguous.

We conclude the [separate property agreement] is a valid transmutation agreement, and the plain terms of the [separate property agreement] indicate it remains in effect during divorce.

We conclude the [separate property agreement] is a valid transmutation agreement and the parties' community property was converted into separate property.

[W]e conclude the [separate property agreement] was valid, and the parties' property was validly separate into their respective separate property trusts.

[W]e hold that the SSSTs are valid and the trusts were funded with separate property stemming from a valid separate property agreement.

The parties contest whether the assets within the SSSTs remained separate property or whether, because of the many transfers of property between the trusts, the assets reverted back to community property. In a divorce involving trust assets, the district court must trace those assets to determine whether any community property exists within the trusts – as discussed below, the parties' respective separate property in the SSSTs would be afforded the statutory protections against court ordered distribution, while any community property would be subject to the district court's equal distributions. We conclude the district court did not trace the assets in question.7 ... Without proper tracing, the district court is left with only the parties' testimony regarding the characterization of the property, which carries no weight.

Separate property contained within the spendthrift trusts is not subject to attachment or execution, as discussed below. However, if community property exists within the trusts, the district court shall make an equal distribution of that

community property.

JONES & LOBELLO 9950 W. Flamingo Road, #100 Las Vegas, Nevada 89147 702-318-5060 FAX: 702-318-5070 Having concluded the district court had subject-matter jurisdiction, the written instrument at issue are valid, and the district court must trace trust assets to determine whether any community property exists within the trusts.

Based upon the Nevada Supreme Court's decision (and consistent with Sprenger v. Sprenger, 110 Nev. 855, 858, 878 P.2d 284, 286 (1994), Lake v. Bender, 18 Nev. 361, (1884); Carlson v. McCall, 70 Nev. 437 (1954); Zahringer v. Zahringer, 76 Nev. 21 (1960); Kelly v. Kelly, 86 Nev. 301 (1970); Todkill v Todkill, 88 Nev. 231 (1972); Burdick v. Pope, 90 Nev. 28 (1974); Cord v. Cord, 98 Nev. 210 (1982); Forrest v. Forrest, 99 Nev. 602 (1983); Pryor v. Pryor, 103 Nev. 148, at 150, 734 P.2d 718 (1987); and Verheyden v. Verheyden, 104 Nev. 342 (1988)) it was clear that Lynita had the burden to prove by clear and convincing evidence that separate property had been transmuted into community property. Unfortunately, this legal issue, was disputed by Lynita for at a minimum two-years post-remand. 1

Despite it being clear that the burden of proof was on her, Lynita demanded that the District Court appoint Larry Bertsch, CPA, as a Special Master to complete the tracing in its Decision entered on April 19, 2018.² Unfortunately, although Eric

It is important to note that after the Nevada Supreme Court issued its Decision, Lynita continued for the next two years litigating the date the tracing period should commence. Lynita's request was repeatedly denied by this Court. Even after the District Court denied Lynita's request, Lynita filed a Petition for A Writ of Mandamus or Prohibition with the Nevada Supreme Court on the issue of the applicable period for tracing between the two Trusts, which was denied.

After this matter was remanded by the Nevada Supreme Court, the ELN Trust immediately requested confirmation that both Eric and Lynita would retain individual experts. Lynita however refused to retain her own expert and demanded Bertsch be appointed as a Special Matter. On August 22, 2017, Lynita argued that this Court "should re-appoint Mr. Bertsch to update the prior forensic accounting

JONES & LOBELLO 9950 W. Plamingo Road, #100 Las Vegas, Nevada 89147 702-318-5060 FAX: 702-318-5070 Lynita's efforts to meet her burden (that <u>clearly</u> could not be met based upon the history of the Parties' trusts) by paying one-half of Mr. Bertsch's fees. Although the Court later removed Mr. Bertsch on October 27, 2020 after it became clear that he was not serving in a neutral capacity, and was not meeting the deadlines imposed by the Court, significant costs were incurred by Eric and/or the ELN Trust.

Based upon what appeared to be efforts by Lynita to dramatically expand the scope of the Supreme Court remand, the ELN Trust filed a "Motion for Determination of Burden of Proof at Trial" on May 18, 2020, to clarify the scope of the issues pending before the Court and the parties' burdens of proof at trial. While the Nevada Supreme Court clearly indicated in its prior Decision that Lynita had the burden to show that separate property was transmuted back to community property (because the purpose of the tracing is "to determine whether any community property exists within the trusts"), and it was clear that Lynita would be required to present clear and convincing evidence that the separate property was transmuted into community property after May 30, 2001, the ELN filed the motion out of an abundance of caution to ensure that there was no confusion regarding Lynita's burden of proof at trial.

through the present date. See Lynita's Reply to Opposition to Countermotion for Final Judgment Consistent with Nevada Supreme Court's Remand, or in the Alternative, for Affirmation of Joint Preliminary Injunction, for a Receiver to Manage Property Pending Final Judgment, for Updated Financial Disclosures and Exchange of Financial Information, and for Sale of Property for Payment of Attorneys' Fees and Costs, filed with this Court on August 22, 2017, at p. 11:27-28.

JONES & LOBELLO 9950 W. Flamingo Road, #100 Las Vogas, Nevada 89147 702-318-5060 FAX: 702-318-5070 On May 21, 2020, Eric filed his Joinder to ELN's Motion for Determination of Burden of Proof at Trial. Despite well settled law, Lynita opposed ELN's motion on June 12, 2020. In this opposition, instead of addressing the issues raised in ELN's motion, Lynita/LSN continued to argue there was "extensive commingling of assets between ELN Trust and LSN Trust." Despite this statement, Lynita/LSN could not provide any examples in their opposition of how commingling had occurred. LSN/Lynita essentially attempted to side-step well settled law in the State of Nevada and the ruling of the Nevada Supreme Court entered on May 25, 2017.

Nevada law was (and is) clear that when property is transferred to an irrevocable spendthrift trust the rights of the transferor are terminated, and the rights of all persons are determined only as provided by the trust agreement. Chapter 166 of the Nevada Revised Statutes defines a spendthrift trust as "a trust in which by the terms thereof a valid restraint on the voluntary and involuntary transfer of the interest of the beneficiary imposed." *See* NRS 166.020.

NRS 166.130 further provides "A beneficiary of a spendthrift trust has no legal estate in the capital, principal or corpus of the trust estate." Despite the well settled law, and knowing neither party purchased any property (to the extent any property was purchased/transferred was done by the trust), Lynita/LSN continue to insist there was community property³.

³ It is important to note, Lynita/LSN post-remand initially argued a tracing was not necessary in her Opposition to Motion to Enforce Supreme Court's Order dated May 25, 2017 filed on July 31, 2017, Lynita requested that this Court review the trial evidence in lieu of requiring a tracing. See id. 6 18-22 ("If the Court determines that it would like to receive additional evidence regarding

On October 27, 2020, the Court issued its "Decision and Order" wherein it reiterated the direction provided by the Nevada Supreme Court and held that the burden of proof by the party asserting that separate property was transmuted into community property lies with the moving party and that Lynita had the burden of proof to establish that a transmutation occurred. Not happy with this decision, Lynita filed a Writ to the Nevada Supreme Court which was denied.

More than three years after the case was remanded by the Nevada Supreme Court and knowing the burden of proof rested with Lynita, Lynita/LSN Trust served their First Post Appeal Request for Production of Documents on Eric and ELN. Lynita/LSN propounded 90 requests for production of documents. The request for production of documents were (1) past the close of discovery; (2) requested documents outside the judicially determined scope of the tracing on remand by the Nevada Supreme Court and the District Court's order; (3) requested documents which were in Lynita's possession, custody, and control; (4) documents which previously disclosed during the course of the case; and (5) were irrelevant, overly burdensome, and/or intended to harass Eric/ELN. Because of LSN/Lynita's bad faith request for production of documents, ELN filed a motion for a protective order on November 18, 2020. Eric joined ELN's motion on November 23, 2020. Lynita/LSN opposed ELN's motion on December 24, 2020. ELN's motion for a

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the character of the parties' property...") After this Court rejected her argument, which was contrary to the Nevada Supreme Court's decision, Lynita demanded that this Court obtain a tracing from Larry L. Bertsch, CPA, and the parties share in the cost. Bersch was ultimately terminated by this Court for failing to perform the tracing as ordered.

JONES & LOBELLO 9950 W. Flamingo Road, #100 Las Vegas, Nevada 89147 702-318-5060 FAX: 702-318-5070 protective order was heard on January 26, 20214.

At the January 26, 2021, hearing the remand trial was continued to October 11, 2021, through October 22, 2021⁵. A scheduling order was entered by the court on January 29, 2021. With the remand trial schedule for October 2021, four years post remand, for the first time, Lynita/LSN issued multiple subpoenas on February 9th and 10th 2021. Lynita/LSN also issued subpoenas on February 17th and February 19th-some of these subpoenas were for documents held in Lynita/LSN name.

An order from the January 26, 2021, hearing regarding the Lindell property was entered on March 3, 2021. This order addressed the rental proceeds LSN/Lyntia had solely receiving despite ELN owning ½ of the property. The order specifically provides:

LYNITA SUE NELSON and the LSN TRUST shall have until March 1, 2021 at 5:00 P.M. to produce an accounting for the Lindell Property from September 1, 2019 through the February 28, 2021, including the back-up documentation relating to said accounting, see January 26, 2021, Hearing Video at 9:57:19-9:58:18.

IT IS FURTHER ORDERED that the February 2021 rental proceeds shall be deposited into a separate account and may only be used to pay for recurring monthly expenses for the Lindell Property; the February 2021 rental proceeds may not be used for any non-emergency repairs and maintenance, see January 26, 2021 Hearing Video at 9:49:15-9:50:03 and 9:54:34 – 9:55:07.

⁴ The order regarding ELN's motion for a protection order was issued on March 15, 2021. The order provides in relevant part (1) a Protective Order was issued in favor of Eric and ELN from producing any documents regarding bank accounts or credit cards held by Lynita and/or LSN; (2) protection ELN and Eric from producing documents prior to May 30, 2001, as it was outside the relevant tracing period; and (3) protecting Eric and ELN producing any and all "cancelled checks" issued by ELN Trust during the tracing period.

⁵ The trial was scheduled to commence on March 15, 2021. It was continued to allow Lynita additional time to meet her burden of proof to October 2021.

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This order became necessary because Lynita/LSN refused to provide an accounting of the rent proceeds received from September 1, 2019, through February 28, 2021. To date, LSN/Lynita has failed to provide the accounting of such monies with the required back-up documentation.

With a trial set for October 2021, and with Mr. Bertsch being removed from the case, Lynita/LSN utilized Anthem Forensics ("Anthem") and Melissa Attanasio to serve as her expert witnesses in this matter. Despite the fact that Anthem's principal - Joe Leauanae - had testified at his deposition on July 27, 2010, that "we've completed most of the forensic accounting analysis," no expert report was produced by Lynita/LSN until April 30, 2021. It is important to note that, pursuant to the scheduling order issued on January 29, 2021, Lynita/LSN were ordered to provide her expert report by April 19, 2021, at 5:00 p.m. LSN/Lynita requested a continuance from Eric and ELN until April 30, 2021, to produce their expert report. LSN/Lynita request was granted by Eric and ELN.

After receiving LSN/Lynita expert report on May 7, 2021, Eric issued a notice of intent to serve a subpoena on Anthem and Melissa Attanasio. At the very last moment, on May 14, 2021, LSN/Lynita filed an objection to the issuance of the That action was done intentionally to delay Eric from receiving subpoena. information from LSN/Lyntia's expert. Lyntia/LSN did not attempt to resolve this issue in good faith, waiting until the proverbial 11th hour to try to discuss her concerns, etc. By waiting until the last minute, Eric was not able to secure the

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relevant documents from Anthem or Attanasio.

In reviewing Anthem's report (despite not having the source documents relied on by Anthem), it quickly became clear that Anthem did not complete a tracing analysis and was unable to identify any specific assets that had been transmuted. Knowing that Lynita/LSN could not meet their burden, Anthem attempted to create artificial assumptions contrary to established caselaw in an attempt to put a proverbial square peg in a round whole, in an effort create false inferences of community property, and to try to cloud the record and support Lynita's flawed positions in this case. Not only did Anthem did not complete a tracing analysis – because it elected to disregard information and documentation that was available – but it was learned that Lynita/LSN denied their expert access to documents that were available to her such as the parties joint tax returns for tax years 2001, 2002, and 2003.

Because Anthem's report failed to identify any transmutation of assets, and fell woefully short of the legal burden Lynita/LSN would need to meet, the ELN Trust filed a motion seeking summary judgment on June 21, 2021. Additionally, because Lynita/LSN failed to identify any transmutation of assets, ELN needed additional time for their expert to provide a rebuttal report. Therefore, ELN requested a continuance of the October 2021 evidentiary hearing and additional ONES & LOBELLO

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time to produce their rebuttal report⁶.

On July 14, 2021, LSN/Lynita filed their opposition. As with ELN's motion for burden of proof, Lynita/LSN attempted to side-step their legal burden and ignore the well established case law, and the order of the Court. The Court had previously ordered on October 27, 2020, consistent with the remand decision issued in 2017 and well settled caselaw, that Lynita/LSN had the burden of proof by to establish by clear and convincing evidence a transmutation occurred. Knowing she could not meet her burden, LSN/Lynita tried her best to explain why she had met her burden by attempting to create a false narrative a transmutation had occurred; even though her own expert could not find any transmutation.

A hearing on ELN's motion for summary judgment, etc. was conducted on August 4, 2021. At the time of the hearing, LSN/Lynita made false representations to the court that a tracing had been completed. Based upon the oral arguments of counsel, the Court continued the matter to September 30, 2021, to allow the Court to consider ELN's pending motion and to thoroughly review LSN/Lynita's expert report. The court did extend the deadline for ELN's rebuttal report to December 31, 2021, and the trial was continued to March 21, 2022.

At the time of the August 4, 2021, hearing the case had been pending postremand for approximately four years and four months. Knowing her case was in

⁶ This request was also necessary because Eric's subpoena to Anthem had not been issued and was pending a resolution on LSN/Lynita's motion.

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jeopardy, and in attempt to protract the litigation, on August 6, 2021, Lynita/LSN filed their motion to compel disclosure regarding disposition of proceeds of Russell Road, etc. In this motion, Lynita/LSN requested the court join NBGS, LLC as a necessary party. Lynita/LSN intentionally asked to join NBGS in order to bring the parties adult children into the action-they are the members of NBGS, LLC. By joining a new party at the last hour, Lynita/LSN knew the trial could not proceed forward, in March 2022, causing additional delays, which she solely benefitted form.

On October 12, 2021, the Court issued its order regarding ELN's motion for summary judgment. The court made the following findings:

- 1. Here, Anthem's expert report admits that its analysis "sought to identify types of transactions that [they] believe provide probative indications of commingling between and/or within the SSSTs at various points during the relevant period." Expert Witness Report, at 10, Nelson v. Nelson, No. D-09-411537-D (Apr. 30, 20:21).
- 2. Additionally, the expert report further admits that its analysis of "commingling between the SSSTs" has been "presented in the form of examples in this report that are not intended to be, and should not be construed as, an exhaustive listing." Id. at 29; Nelson v. Nelson, No. D-09-411537-D (Apr. 30, 2021).
- 3. Upon review of the expert report, this Court has identified three types of transactions: (1) transfers of property from one trust to another trust: (2) one spouse's transfer of property to the other spouse; and (3) transfers of property from Eric Nelson's businesses to the parties' children.

After making these introductory findings, the court went on to make specific findings regarding specific pieces of property addressed in the Anthem Report. The

JONES & LOBELLO 9950 W. Flamingo Road, #100 Las Vegas, Nevada 89147 702-318-5060 FAX: 702-318-5070 relevant findings are as follows:

Russell Road Findings

This Court finds that the transaction outlined in the expert report shows that the LSN Trust transferred its ownership interest in the Russel Road property to CJE&L when it transferred title to the real property to CJE&L for "no financial consideration" back in 2004.

At this time, the Court finds that one trust transferred its separate property asset to a different trust. Therefore, the evidence offered by the expert report was not clear and convincing enough to rebut this Court's presumption that the assets held by the SSSTs are the separate property of their respective trusts.

Lindell Office

This Court finds that the transfer of the Lindell Office from one trust to another is not in-of-itself sufficient to rebut this Court's presumption that the assets held by the SSSTs are the separate property of their respective trusts.

High Country Inn

... this Court finds that the LSN Trust's transfer of the High Country Inn to the ELN Trust for "no financial consideration" is limited to establishing that one trust transferred its separate propelly interest to a different trust. This in-of-itself is insufficient to demonstrate that the character of the property was transmuted from separate property to community property.

At this time the Court finds that the expert report failed to rebut the presumption that the money attributable to the sale of the High Country Inn is the separate property of the ELN Trust.

Tierra del Sol

.. this Court finds that the report's description of the sale does not rebut the presumption that the proceeds received by the trusts as a result of the sale are characterized as each trust's separate property

Tropicana

This Court finds that the expert report's description of this trust-to trust transfer of property is insufficient to rebut this Court's presumption that the proceeds from the sale is the separate property of the ELN Trust.

Therefore, this Court presumes that the proceeds from the Tropicana Avenue property sale are the sole separate property of the ELN Trust.

Flamingo Road

Brian Head Cabin

Since this transaction merely amounted to a transfer of one trust's separate property to another trust, this Court finds that the expert report has not met the burden of rebutting this Court's separate property presumption towards the Brian Head Cabin by clear and convincing evidence.

Wyoming Horse Racing

this Court finds that Lynita's expert report failed to offer evidence sufficient to rebut this Court's separate property presumption by clear and convincing evidence.

Rental Income Attributable to Silver Slipper RV Park

The mere fact that the ELN Trust received money attributable to rent payments from land once held by the LSN Trust is not in-of-itself sufficient to rebut the presumption that the ELN Trust has a separate property interest in the money it received pursuant to the agreement.

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2.7

Rental Income from Property in Greenville, Mississippi

This Court finds that the expert report's mere description of the ELN Trust's receipt of rent payments attributable to land owned by the LSN Trust is not in-of-itself sufficient to rebut this Court's presumption that the assets held by the trusts are characterized as separate property.

Based upon the above-mentioned findings, the Court further found:

This Court finds that because Anthem admitted its report is limited to providing an incomplete list of transactions believed to be "probative indications of commingling between the SSSTs," the report in-of-itself fails to offer evidence that is clear and convincing to rebut this Court's presumption that the assets held by the SSSTs are the separate property of each respective trust.

Therefore, this Court presumes that the following assets held by the SSSTs are characterized as the separate property of their respective trusts: (a) the Russel Road Property; (b) Lindell Office; (c) High Country Inn; (d) Tierra del Sol; (e) Tropicana A venue Property; (f) Flamingo Property; (g) Brian Head Cabin; (h) Wyoming Horse Racing, Inc.; (i) the rental income attributed to Silver Slipper RV Park; and U) the rental income attributable to the real property in Greenville, Mississippi.

The order clearly indicated Lynita/LSN had not met her burden. Although the Court did not grant summary judgment the Court confirmed that Lynita bore the burden of proof and had fallen far short of meeting that burden with Anthem's report. The Court's findings in the MSJ Order provided Lynita/LSN with a framework as to what Lynita/LSN would need to prove at the trial in this matter.

Instead of focusing on the framework of what she needed to provide at the trial, Lynita/LSN on October 26, 2021 elected to file a Motion to Correct, Clarify, Alter or Amend, and/or Reconsider Decision on Motion for Summary Judgment entered October 12, 2021. ELN filed their opposition on November 19, 2021. A

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hearing was conducted on LSN/Lynita's motion on January 11, 2022. The court issued its order on February 3, 2022, denying LSN/Lynita's motion.

Despite being provided with a clear road map indicating the issues with her expert report and what needed to be done to meet the burden, Lynita/LSN spent the next five months litigating issues which were not relevant to the pending matters before the court. Lynita focused her energies in filing multiple motions all of which required Eric and ELN to respond too.

Knowing her expert could not provide clear and convincing evidence a transmutation occurred, Lynita/LSN elected to proceed forward to trial. The trial commenced on March 28, 2022. At the time of the trial commencing, the case had been remanded for five years. Lynita/LSN presented evidence on March 28th, 29th, and March 30th, April 4th, 6th, 7th, 27th, and 28th. On April 28, 2022, Lynita/LSN closed their case in chief. During the eight days LSN/Lynita presented their case in chief, they offered nothing materially different than the information contained in the Anthem Report. With Lynita/LSN failing to meet their burden of proof, on May 2, 2022, ELN and Eric made their motion for a judgment pursuant to NRCP 52(c).

The Court issued an order on June 29, 2022, granting ELN Trust/Eric's Motion for Judgment on Partial Findings pursuant to NRCP 52(c) after hearing evidence over 8 days of testimony.⁷

The June 29, 2022 Order also indicated that it required additional evidence regarding Lynita/the LSN Trust's claim that certain management fees were considered Eric's individual wages.

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After the Court issued its order on June 29, 2022 ("June 29, 2022, Order"), Lynita/the LSN Trust continued to file frivolous motions to second-guess the Court's prior rulings. For example, and by no means of limitation, on July 4, 2022, Lynita/the LSN Trust filed a "Motion to Correct, Clarify, Alter or Amend, and/or Reconsider Decision and Order entered June 29, 2022," which was denied by the Court in an Order entered on January 31, 2023. It is important to note that in the "Motion to Correct, Clarify, Alter or Amend, and/or Reconsider Decision and Order entered June 29, 2022," Lynita/the LSN Trust unconscionably demanded that the Court find that tax returns from 2001 and 2002 be deemed community property despite the fact that the Court found that the issue "was merely mentioned during trial," and Lynita/the LSN Trust's own expert had failed to conduct any tracing investigation regarding this issue. See Decision Denying Defendant's Motion to Correct, Clarify, Alter or Amend, and/or Reconsider Decision and Order entered June 29, 2022. This is just further evidence of the absurd legal positions taken by Lynita/the LSN Trust, which unnecessarily increased tEric's and ELN Trust's attorneys' fees.

On January 31, 2023, the court issued its final order regarding Lynita/LSN claims regarding management fees. In this order, the Court found Lynita/LSN did not meet their burden, and "management fees" for Silver Slipper and Lindell Professional Plaza are deemed the separate property of the ELN Trust.

II. ARGUMENT.

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Rule 54(d)(2)(A) provides:

Claim to be by Motion. A claim for attorney fees must be made my motion. The court may decide a post judgment motion for attorney fees despite the existence of a pending appeal from the underlying final judgment.

Rule 54(d)(2) provides:

Unless a statute or a court order provides otherwise, the motion must:

- (i) be filed no later than 21 days after written notice of entry of judgment is served;
- (ii) specify the judgment and the statute, rule, or other grounds entitling the movant to the award;
- (iii) state the amount sought or provide a fair estimate of it;
- (iv) disclose, if the court so orders, the nonprivileged financial terms of any agreement about fees for the services for which the claim is made; and
- (v) be supported by:
 - (a) counsel's affidavit swearing that the fees were actually and necessarily incurred and were reasonable;
 - (b) documentation concerning the amount of fees claimed; and
 - (c) points and authorities addressing the appropriate factors to be considered by the court in deciding the motion.

EDCR 5.219 provides:

Sanctions may be imposed against a party, counsel, or other person, after notice and an opportunity to be heard, for unexcused intentional or negligent conduct including but not limited to:

- (a) Presenting a position that is obviously frivolous, unnecessary, or unwarranted;
- Multiplying the proceedings in a case so as to increase costs (b) unreasonably and vexatiously;
- (c) Failing to prepare for a proceeding;
- (d) Failing to appear for a proceeding;
- (e) Failing or refusing to comply with these rules; or
- (f) Failing or refusing to comply with any order or directive of the court.

A party may seek attorney fees when allowed by an agreement, rule, or statute. In addition to when allowed by a specific statute, a court may grant an award of attorney's fees to a prevailing party when (a) the prevailing party's recovery is not more than \$20,000; or (b) when the court finds that the claim, cross-claim, third party complaint, or defense was brought by the opposing party without a reasonable ground or to harass the prevailing party.

Further, NRS 18.010(2)(b) provides that:

The Court shall liberally construe the provisions of this paragraph in favor of awarding attorney's fees in all appropriate situations. It is the intent of the Legislature that the court award attorney's fees pursuant to this paragraph . . . in all appropriate situations to punish for and deter frivolous or vexatious claims and defenses because such claims and defenses overburden limited judicial resources, hinder the timely resolution of meritorious claims and increase the costs of engaging in business and providing professional services to the public.

Moreover, the decision to award attorney fees is within the sound discretion of the district court and will not be overturned absent a "manifest abuse of discretion." 10

⁸ See NRS 18.010 (governing awards of attorney fees); RTTC Communications, LLC v. The Saratoga Flier, Inc., 121 Nev. 34, 40, 110 P.3d 24, 28 (2005) (noting that "a court may not award attorney fees absent authority under a specific rule or statute").

⁹ See NRS 18.010(2)(b).

Kahn v. Morse & Mowbray, 121 Nev. 464, 479, 117 P.3d 227, 238 (2005); Albios v. Horizon Communities, Inc., 122 Nev. 409, 417, 132 P.3d 1022, 1027-28 (2006).

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LYNITA/THE LSN TRUST FAILED TO RECOVER MORE THAN \$20,000 A. ON REMAND.

As indicated supra, on May 25, 2017, the Nevada Supreme Court issued its Decision, during which time Eric was forced to defend against Lynita/the LSN Trust's unsupported position that she possessed a community property interest in the ELN Trust. Although Lynita/LSN previously advised the court they will receive more monies post-remand than initially awarded in the decree of divorce, Lynita/LSN failed to recover more than \$20,000.00 on remand. Therefore, the Court should order Lynita/the LSN Trust to pay Eric attorneys' fees in the amount of \$172,637.61, which is comprised of the attorneys' fees incurred by Eric post remand.

В. THE CLAIMS BROUGHT BY LYNITA/LSN TRUST ON REMAND WERE BROUGHT WITHOUT A REASONABLE GROUND.

NRS 18.010(2)(b) allows the court to award attorneys' fees to a party if the court finds that a claim was brought by the opposing party without a reasonable ground. Further, "[flor purposes of NRS 18.010(2)(b), a claim is frivolous or groundless if there is no credible evidence to support it." Rodriguez v. Primadonna Co., LLC, 125 Nev. 578, 588, 216 P.3d 793, 800 (2009).

As indicated herein, the claims brought by Lynita/the LSN Trust, and the majority of positions taken by Lynita/the LSN Trust throughout the remand proceeding, were brought without a reasonable ground. For example, and by no means of limitation, the arguments/claims that Lynita/the LSN Trust brought without reasonable ground are as follows:

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· Lynita/LSN post-remand initially argued a tracing was not necessary in her Opposition to Motion to Enforce Supreme Court's Order dated May 25, 2017 filed on July 31, 2017, Lynita/LSN requested that this Court review the trial evidence in lieu of requiring a tracing. See id. 6 18-22 ("If the Court determines that it would like to receive additional evidence regarding the character of the parties' property...") After this Court rejected her argument, which was contrary to the Nevada Supreme Court's decision, Lynita demanded that this Court obtain a tracing from Larry L. Bertsch, CPA, and the parties share in the cost. Bersch was ultimately terminated by this Court for failing to perform the tracing as ordered.

- That the tracing period should be 1993 June 3, 2013, as opposed to May 31, 2001 – June 3, 2013:
- That Eric/ELN, as opposed to Lynita/LSN, had the burden to prove by clear and convincing evidence that separate property had been transmuted into community property;
- · Lynita/LSN propounding discovery on Eric/ELN that was in their possession, outside the scope of the tracing period, and was unduly burdensome; and
- The tracing prepared by Anthem was sufficient to show that separate property had been transmuted into community property.

Eric concedes that this matter was in fact remanded back to this Court to afford Lynita/the LSN Trust the opportunity to prove her case-in-chief. That being said, it became readily apparent months prior to trial that Lynita/the LSN Trust could not

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meet her stringent burden. Notwithstanding, Lynita/the LSN Trust continued to relentlessly pursue their claims without reasonable grounds, and after this Court did not rule in Lynita/LSN's favor she filed a motion for reconsideration.

NRS 18.010(2)(b) provides that it should be liberally construed in favor of awarding attorneys' fees in appropriate situations. Here, the remand proceeding has been ongoing for over five years and Undersigned Counsel prepared for, and attended, a multiple day trial that began in March 2022, despite no reasonable ground for Lynita/the LSN Trust's claims. Lynita/the LSN Trust's behavior in this proceeding is exactly the kind which NRS 18.010(2)(b) seeks to prevent. Accordingly, the Court should award the ELN Trust's attorneys' fees pursuant to NRS 18.010(2)(b).

C. LYNITA/ LSN TRUST'S CLAIMS WERE BROUGHT TO HARASS ERIC.

NRS 18.010(2)(b) provides that a party may recover attorneys' fees if the court finds that a claim was brought to harass the prevailing party. A prevailing party has been clarified to include plaintiffs, counterclaimants, and defendants. 11 In Spencer v. Klementi, 136 Nev. 325, 466 P.3d 1241, 1248 (2020), the court affirmed the district court's order granting summary judgment in favor of respondent Mary Kinion. In Spencer, the court further determined that the district court did not abuse it discretion in finding that Kinion was the prevailing party and awarding Kinion attorney fees based on a NRS 18.010(2)(b) determination that the malicious

¹¹ Smith v. Crown Fin. Servs. of Am., 111 Nev. 277, 284, 890 P.2d 769, 773 (1995).

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prosecution counterclaim brought against Kinion was brought or maintained without reasonable ground or to harass the prevailing party. 12

Similarly, EDCR 5.219 (a) and (b) were designed to prevent the same type of actions as discussed in Spencer.

Here, the Court ruled in favor of Eric by finding Eric had not commingled any community property into the ELN Trust. Since remand, Lynita has lost the majority, if not all issues. Notwithstanding, at every turn, Lynita/the LSN Trust would ask the Court to reconsider its prior orders as stated herein. Lynita/the LSN Trust knew that as long as they continued pursuing her claims, Eric would be forced to defend against them. Accordingly, Eric should be awarded attorneys' fees pursuant to NRS 18.010(2)(b).

D. THE FEES SOUGHT BY ERIC ARE REASONABLE AND JUSTIFIED IN AMOUNT.

In Nevada, a requesting party must demonstrate the reasonableness of attorney fees with reference to the four factors set forth in Brunzell v. Golden Gate Nat'l Bank, 85 Nev. 345, 455 P.2d 31 (1969). "In determining the amount of fees to award, the [district] court is not limited to one specific approach; its analysis may begin with any method rationally designed to calculate a reasonable amount, so long as the requested amount is reviewed in light of the... Brunzell factors."13

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Spencer v. Klementi, 136 Nev. 325, 466 P.3d 1241, 1248 (2020)

Haley v. Eighth Judicial Dist. Court, 128 Nev., Adv. Op. 16, 273 P.3d 855, 860 (2012); see also Gunderson v. D.R. Horton, Inc., 319 P.3d 606, 615-616, 130 Nev. Adv. Rep. 9 (2014).

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The following four Brunzell factors are to be considered by the court:

- the qualities of the advocate: ability, training, education, (1)experience, professional standing and skill;
- the character of the work to be done: its difficulty, its intricacy, (2) its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation;
- the work actually performed by the lawyer: the skill, time and (3) attention given to the work;
- (4) the result: whether the attorney was successful and what benefits were derived 14

When considering whether the fees requested by Eric are reasonable and justified, it is important to consider the amount of fees Lynita/LSN have paid during the same time frame. See exhibit "1" attached, billing statements. On February 16, 2023, a "Notice of Attorneys' Lien" was filed by Lynita/LSN counsel. Lynita/LSN counsel requested a lien in the amount of \$521,935.52 as of January 31, 2023. The lien amount during the same time period is more than Eric and ELN are requesting in an award of attorney's fees for the same time period especially considering the monies that have previously been paid by Lynita/LSN Trust to their counsel.

The court should recall on June 4, 2014, the court transferred the "Banone" properties from ELN to LSN. LSN received 100% of the rents from "Banone" from June 4, 2014, through April 2018. LSN/Lynita used \$159,810.00 of the rent proceeds for "Legal Expenses" which were paid to the "Dickerson Law Group."

¹⁴ Brunzell, 85 Nev., at 349, 455 P.3d, at 33.

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The court will further recall, ELN was allowed to purchase LSN's interest in the "Brian Head" cabin to provide Lynita/LSN additional monies to continue litigation. The sale of Brian Head was completed in January 2021, and resulted in the net proceeds of \$537,050.00 being paid to LSN. Between the net proceeds received for the sale of Brian Head and the monies Lynita/LSN paid from the Banone rental income toward attorney's fees, LSN/Lynita paid \$696,860 to their counsel. This does not include any other payments LSN/Lynita paid to counsel.

With LSN/Lynita paying counsel \$696,860 and still owing \$521,935.52, the minimum amount LSN/Lynita paid to counsel is \$1,218,795.52. In light of the monies LSN/Lynita at minimum paid to her counsel, Eric's request is more than reasonable and justified.

As it relates to the Brunzell factors, Mr. Carman and Ms. Hauser, have attached their Declarations as exhibit "2." Applying those factors here, it is evident that all four factors have been met by the work performed by Jones & LoBello and Carman & Price.

Qualities of the Advocates. (1)

First, the quality of Jones & LoBello and Carman & Price as advocates is wellknown within the legal market in Clark County, Nevada.

Michelle Hauser's ("Ms. Hauser") billable hourly rate is \$395.00. Ms. Hauser was admitted to practice by the State Bar of Nevada in 2001 and has practiced complex family law exclusively since 2005. Previously, Ms. Hauser practiced in the

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areas of criminal and civil law. Ms. Hauser attended the American Bar Association Section of the Family Law Trial Advocacy Institution in May 2008. Ms. Hauser is admitted to the United States District Court for the District of Nevada and the U.S. Court of Appeals for the Ninth Circuit. Ms. Hauser is a contributing author for the Nevada Family Law Practice Manual, 2008 Edition. Ms. Hauser has served as the Secretary, Vice-Chair, and Chair of the Nevada Family Law Section Executive Committee. Ms. Hauser has also acted as the "Secretary" for the Family Law Bench Bar committee and has participated in multiple committees. Ms. Hauser has also taught Continuing Legal Education and has participated in State Bar committees.

Michael P. Carman's billable hourly rate is \$400.00. Mr. Carman began practicing in 1997 and has practiced primarily in the area of family law for over twenty years (20) years. Mr. Carman has conducted hundreds of contested hearings and / or trials in Clark County, and has represented clients before the Supreme Court of Nevada as an A/V peer-reviewed attorney and has received and A/V Judicial Rating as well. Michael has presented at various Continuing Legal Education programs, previously served on the State Bar of Nevada Family Law Executive Council, and has been honored to serve on numerous committees including the Judicial Education Requirements Study Committee, the Eighth Judicial District Family Court Bench / Bar Committee, the Child Witness Committee, and the Eighth Judicial District Family Court Rules Committee. Mr. Carman has also participated in the Eighth Judicial District Settlement Master Program.

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To minimize legal expenses to Eric, Ms. Hauser and Mr. Carman did not bill their individual hourly rate when they both appeared before the court and instead billed at a reduced co-counsel rate. Moreover, Ms. Hauser and Mr. Carman delegated tasks to quality employees who have a lower billable rate, namely Susan Pinjuv, who was Ms. Hauser's paralegal. Ms. Pinjuv billed at the rate of \$150.00 per hour.

Ms. Hauser and Mr. Carman are both in good standing in the State of Nevada.

(2.)Character of Work Performed.

Second, the character of the work of Jones & LoBello and Carman & Price has performed has been extremely important and necessary. The underlying facts of this case presented an issue regarding the transfers of the Disputed Properties between the LSN Trust and numerous third-parties, including the ELN Trust, etc. As such, the character of the work performed by Ms. Hauser and Mr. Carman was extremely important in demonstrating to the court there was no community property in the ELN Trust. Further, Eric is only requesting an award of attorney's fees from April 2021 forward. The majority of the fees was incurred for preparing and conducting the trial.

(3) Work Performed.

The work performed included but is not limited to:

- а.. Preparing for and attend the trial which commenced in March 2022;
- b. Preparing for and conducting the deposition of Joe Leaunae and Jennifer Allen of Anthem Forensics;
 - Preparing for and conducting the deposition of Lynita; c.

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and

d.	Defending the	deposition	of Eric Nelson,	and Douglas	Winters
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- e. Drafting the PTM, Oppositions to Lynita's/LSN's multiple motions;
- f. Attending multiple hearings.

(4) Result.

Lastly, there can be no doubt the quality and outcome of Ms. Hauser and Mr. Carman's representation as indicated in the Court's decision entered on June 29, 2022, and January 31, 2023. Indeed, but for counsel's diligent work Eric would not have been the prevailing party.

III. CONCLUSION

Based on the foregoing, the prevailing party, the Eric respectfully requests an Order issue pursuant to NRS 18.010(2)(b), awarding it attorneys' fees of \$172,637.61, which were reasonably incurred in this matter to be assessed against Lynita, individually, and the LSN Trust.

DATED this 21st day of February, 2023.

JONES & LOBELLO

/s/ Michelle A. Hauser
Michelle A. Hauser, Esq.
Nevada State Bar No. 7738
Attorneys for Plaintiff,
ERIC NELSON
Individually

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CERTIFICATE OF SERVICE

1 2 Pursuant to NRCP 5(b), I certify that I am an employee of JONES & LOBELLO 3 4 and that on the 21st day of February, 2023, I caused the above and foregoing 5 document Eric Nelson's, In His Individual Capacity, Motion for Attorney's Fees 6 to be served as follows: 7 8 by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las 9 Vegas, Nevada; and 10 X pursuant to N.E.F.C.R. 9, to be sent via electronic service; 11 pursuant to EDCR 7.26, to be sent via facsimile; 12 JONES & LOBELLO 9950 W. Flamingo Road, #100 Las Vegas, Nevada 89147 702-318-5060 FAX: 702-318-5070 13 by email to: 14 hand delivered 15 to the party or their attorney(s) listed below at the address and/or facsimile number 16 indicated below: 17 Josef Karacsonyi, Esq., Jeffrey P. Luszeck, Esq. josef@thedklawgroup.com 18 jluszeck@sdfnvlaw.com info@thedklawgroup.com Attorney for Matt Klabacka 19 bob@thedklawgroup.com natalie@thedklawgroup.com 20 Attorney for Defendant 21 22 23 and that there is regular communication by mail between the place of mailing and the place(s) so addressed. 24 25 /s/Rebecca Armington 26 An Employee of JONES & LOBELLO 27 28

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AA2365

DISTRICT COURT FAMILY DIVISION CLARK COUNTY, NEVADA

ERIC L. NELSON	Case No. D-09-411537-D						
Plaintiff/Petitioner	Dept. O						
v. LYNITA SUE NELSON, MATT KLABACI							
Defendant/Respondent	MOTION/OPPOSITION FEE INFORMATION SHEET						
subject to the reopen filing fee of \$25, unless specificall Oppositions filed in cases initiated by joint petition may accordance with Senate Bill 388 of the 2015 Legislative	Session.						
Step 1. Select either the \$25 or \$0 filing fee in the box below. \$\textstyle \textstyle							
The Motion/Opposition being filed with fee because: The Motion/Opposition is being file entered. The Motion/Opposition is being file established in a final order. The Motion/Opposition is for reconstant.	th this form is not subject to the \$25 reopen ed before a Divorce/Custody Decree has been d solely to adjust the amount of child support sideration or for a new trial, and is being filed at or decree was entered. The final order was						
Step 2. Select the \$0, \$129 or \$57 filing fee in							
▼ \$0 The Motion/Opposition being filed with \$57 fee because: ▼ The Motion/Opposition is being filed with this form \$129 The Motion being filed with this form	th this form is not subject to the \$129 or the led in a case that was not initiated by joint petition. ition previously paid a fee of \$129 or \$57.						
to modify, adjust or enforce a final or	rder.						
\$57 The Motion/Opposition being filing wan opposition to a motion to modify, and the opposing party has already party	with this form is subject to the \$57 fee because it is adjust or enforce a final order, or it is a motion aid a fee of \$129.						
Step 3. Add the filing fees from Step 1 and Step	ep 2.						
The total filing fee for the motion/opposition I \$\sim\$\$ \bigsim\$\$ \bigsim\$\$ \bigsim\$\$ \bigsim\$\$ \bigsim\$\$ \$57 \bigsim\$\$ \$82 \bigsim\$\$ \$129 \bigsim\$\$ \$154	am filing with this form is:						
Party filing Motion/Opposition: ERIC L. NEL							
Signature of Party or Preparer /s/ Rebecca	runungton						

EXHIBIT 1

EXHIBIT 1



9950 W. Flamingo Road, #100 Las Vegas, NV 89147 Phone: 702-318-5060 Fax: 702-318-5070 Email: billing@joneslobello.com www.joneslobello.com

INVOICE

Invoice # 29166
 Date: 05/31/2022

Eric Nelson 2911 Bella Kathryn Cir. Las Vegas, NV 89101

8109-0001

Nelson, Eric v. Nelson, Lynita(Post-Divorce)

Services

Date	Attorney	Description	Hours	Rate	Total
05/02/2022	MAH	FINISH PREPARING FOR NRCP 52(C) ARGUMENT. TELEPHONE CALL WITH JL REGARDING NRCP 52(C) ARGUMENT BEFORE HEARING. TRAVEL TO AND ATTEND NRCP 52(C) ARGUMENT.	3.50	\$337.50	\$1,181.25
05/09/2022	JDJ	(NO CHARGE)	3.20	\$0.00	\$0.00
05/11/2022	MAH	REVIEW AND RESPOND TO EMAIL CORRESPONDENCE FROM DEPT O'S LC REGARDING MOVING HEARING DATE TO 5.23.2022.	0.20	\$395.00	\$79.00
		PREPARE EMAIL CORRESPONDENCE TO CLIENT REGARDING MOVING HEARING DATE TO 5.23.2022.			
05/17/2022	MAH	TELEPHONE CALL WITH CLIENT REGARDING CASE STATUS.	0.40	\$395.00	\$158.00
05/18/2022	MAH	PREPARE EMAIL CORRESPONDENCE TO MP REGARDING TRIAL	0.20	\$395.00	\$79.00

\$3,871.25

Services Subtotal

			PREP AND RELATED ISSUES.			
	05/23/2022	MAH	TRAVEL TO AND ATTEND DECISION BEFORE JUDGE SULLIVAN.	4.00	\$337.50	\$1,350.00
			BEGIN PREPARING FOR MEETING WITH ALL COUNSEL. REVIEW OF EVIDENCE FOR JULY 2022 EVIDENTIARY HEARING DATE.			
			TELEPHONE DISCUSSION WITH JL REGARDING MEETING ON 5.24.2022.			
			PREPARE EMAIL CORRESPONDENCE TO DW REGARDING MEETING.			
(05/24/2022	MAH	REVIEW EMAIL CORRESPONDENCE FROM JL REGARDING EVIDENTIARY ISSUES.	2.80	\$337.50	\$945.00
			TRAVEL TO AND ATTEND MEETING WITH ALL CONCERNED PARTIES REGARDING JULY 5TH EVIDENTIARY HEARING.			
C	5/27/2022	MAH	REVIEW MULTIPLE EMAILS AND RESPOND REGARDING MEETING WITH DG.	0.20	\$395.00	\$79.00

Expenses

Date	Quantity		Description	Total
05/03/2022	1.00	Court Filing Fee: Court Filing Fee (\$3.50)		\$0.00
05/05/2022	235.00	Copies		\$70.50
05/09/2022	5.00	Copies: Copies		\$1.50
			Expenses Subtot	al \$72.00

Time Keeper	Hours	Rate	Total
Michelle Hauser	1.0	\$395.00	\$395.00
Michelle Hauser	10.3	\$337.50	\$3,476.25
John Jones, Esq.	3.2	\$0.00	\$0.00
		Subtotal	\$3,943.25
		Total	\$3,943.25
		Payment (06/08/2022)	-\$3,943.25
		Balance Owing	\$0.00

Matter Financial Summary

	Outstanding Balance		New Charges (Current Invoice)		Payments Received on this Invoice		Total Amount Outstanding
(\$554.40	+	\$3,943.25) - (\$3,943.25) =	\$554.40

Credit Card Payment History

Date	Reference	Note	Status	Amount
06/08/2022	Banone Ifc	Linked payment for Eric Nelson	Completed	\$3,943.25
			Total Payments	\$3,943.25

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INVOICE

Invoice # 29817 Date: 06/30/2022

Eric Nelson 2911 Bella Kathryn Cir. Las Vegas, NV 89101

8109-0001

Nelson, Eric v. Nelson, Lynita(Post-Divorce)

Services

Date	Attorney	Description	Hours	Rate	Total
06/02/2022	МАН	PREPARE FOR MEETING WITH DG, JL, AND MC RE: TRIAL PREP. TRAVEL TO AND ATTEND MEETING.	2.50	\$337.50	\$843.75
06/03/2022	MAH	REVIEW AND RESPOND TO EMAIL FROM JL RE: ADDITIONAL INFORMATION REGARDING TRIAL PREP.	0.20	\$395.00	\$79.00
06/05/2022	MAH	PREPARE EMAIL CORRESPONDENCE TO DW RE: INFORMATION FOR TRIAL.	0.20	\$395.00	\$79.00
06/07/2022	MAH	REVIEW AND RESPOND TO EMAIL CORRESPONDENCE FROM	0.20	\$395.00	\$79.00
06/08/2022	MAH	REVIEW AND RESPOND TO EMAIL CORRESPONDENCE FROM JL. PROVIDE ADDITIONAL INFORMATION	0.50	\$395.00	\$197.50
06/21/2022	MAH	PREPARE FOR TRIAL RE: REVIEWING INFORMATION BY	0.50	\$395.00	\$197.50

		WITNESSES.				
06/28/2022	MAH	ATTEND CONFERENCE WITH ALL COUNSEL RE: TRIAL PREPARATION.		1.00	\$337.50	\$337.50
06/28/2022	MAH	CONTINUE WITH TRIAL PREPARATION. REVIEW FINANCIAL DOCUMENTS.		2.50	\$395.00	\$987.50
		TELEPHONE CONFERENCE WITH DW RE: TRIAL PREPARATION.				
06/29/2022	MAH	REVIEW DISTRICT COURT'S TRIAL DECISION.		0.50	\$395.00	\$197.50
		PREPARE EMAIL CORRESPONDENCE RE:				
			Service	s Subto	otal	\$2,998.25

Expenses

Date	Quantity	A PART OF THE REAL PROPERTY.	Description		Total
06/09/2022	1.00	Court Filing Fee: Court Filing Fee			\$3.50
				Expenses Subtotal	\$3,50

STATE OF THE PARTY	Time Keeper	Hours	Rate	Total
Michelle Hauser		4.6	\$395.00	\$1,817.00
Michelle Hauser		3.5	\$337.50	\$1,181.25
		Subtotal		\$3,001.75
			Total	\$3,001.75
			Payment (07/19/2022)	-\$3,001.75
			Balance Owing	\$0.00

Matter Financial Summary

	Outstanding Balance		New Charges (Current Invoice)		Payments Received on this Invoice		T	otal Amount Outstanding	
(\$554.40	+	\$3,001.75) - (\$3.001.75) =		\$554.40	

Credit Card Payment History

Date	Reference	Note	Status	Amount
07/19/2022	Erica Nelson	Linked payment for Eric Nelson	Completed	\$3,001.75
			Total Payments	\$3,001.75

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INVOICE

Invoice # 30265 Date: 07/31/2022

Eric Nelson 2911 Bella Kathryn Cir. Las Vegas, NV 89101

8109-0001

Nelson, Eric v. Nelson, Lynita(Post-Divorce)

Services

Date	Attorney	Description	Hours	Rate	Total
07/04/2022	МАН	ATTEND TELEPHONE CONFERENCE WITH ALL COUNSEL AND EXPERT.	3.00	\$395.00	\$1,185.00
		REVIEW AND REVISE EXAM AND VIDEOS.			
		REVIEW PRIOR TRIAL TESTIMONY RE: MANAGEMENT FEE.			
		CONTINUE PREPARING FOR MANAGEMENT FEE TRIAL.			
07/05/2022	MAH	TRAVEL TO AND ATTEND EVIDENTIARY HEARING RE: MANAGEMENT FEES	4.00	\$337.50	\$1,350.00
07/06/2022	MAH	BEGIN PREPARING OUTLINE OF OPPOSITION OF PLAINTIFF'S MOTION TO CORRECT, CLARIFY, ETC.	0.50	\$395.00	\$197.50
07/07/2022	MAH	REVIEW OUTLINE OF OPPOSITION TO DEFENDANT'S MOTION TO ALTER, AMEND, ETC. PREPARED BY JL AND BEGIN REVIEWING	1.50	\$395.00	\$592.50

		EVIDENCE TO SUPPORT FINDINGS, PROEDURAL POSTULATE, A DRAFTING OF RESPONSE TO OPPOSITION.	ND		
07/08/2022	MAH .	REVIEW AND RESPOND TO JL'S EMAIL RE:OPPOSTION.	0.20	\$395.00	\$79.00
07/11/2022	: JJS	REVIEW ORDERS AND TAKE NOTES ON SAME.	0.60	\$250.00	\$150.00
07/11/2022	MAH	PREPARE FOR AND CONDUCT TELEPHONE CONFERENCE WITH RE: OPPOSITION AND COUNTERMOTION	JL 0.50	\$395.00	\$197.50
07/12/2022	MAH	CONTINUE WORKING ON OPPOSITION TO MOTION FILED BY DEFENDANT RE: REVIEW ANTHEM REPORT, BEGIN REVIEWING TESTIMONY OF JENNY, REVIEW EXHIBISTS ENTERED INTO TRIA AND RELATED PLEADINGS.	2.50 L,	\$395.00	\$987.50
		TELEPHONE CALL WITH JL RE: OPPOSITION.			
		TELEPHONE CALL TO DW: QUESTIONS REGARDING DEFENDANT ARGUMENT.	r'S		
07/13/2022	JJS	RESEARCH AND CONFERENCE WITH MAH	2.70	\$250.00	\$675.00
07/13/2022	MAH	CONTINUE PREPARING DRAFT OF OPPOSITION.	4.00	\$395.00	\$1,580.00
		CONTINUE TO REVIEW RELEVANT COURT ORDERS, REPORT, AN TESTIMONY ETC TO PREPARE OPPOSITION.	D		
07/14/2022	JJS	RESEARCH ON CLEAR AND CONVINCING STANDARD.	2.50	\$250.00	\$625.00
07/14/2022	MAH	CONTINUE PREPARING OPPOSITION TO DEFENDANT'S MOTION.	1.00	\$395.00	\$395.00
07/15/2022	MAH	CONTINUE PREPARING DRAFT OF OPPOSITION AND COUNTERMOTION.	1.50	\$395.00	\$592.50
		TELEPHONE CALL WITH JL RE: OPPOSITION AND COUNTERMOTION.			
		PREPARE EMAIL CORRESPONDENCE TO JL RE: DRAFT OF INTRODUCTION.			
07/18/2022	JJS	(NO CHARGE) FURTHER REVIEW AND ANNOTATE FAMILY COURT ORDER.	1.80	\$0.00	\$0.00
07/19/2022	MAH	PREPARE DRAFT OF OMMITTED ASSET ISSUE.	2.50	\$395,00	\$987.50
		REVIEW ANTHEM REPORT, GERETY REPORT, AND RELEVANT PLEADINGS TO PREPARE OPPOSITION.			
		REVIEW EDCR'S TO INCLUDE IN OPPOSITION.			
		PREPARE EMAIL CORRESPONDENCE TO JL RE: OPPOSTION.			
07/20/2022	JJS	BRIEF REVIEW OF OPPOSING PARTY'S MOTION FOR RECONSIDERATION.	0.40	\$250.00	\$100.00
07/25/2022	МАН	FINISH PREPARING DRAFT OF OPPOSITION TO MANAGEMENT FEE	≣ 1.50	\$395.00	\$592.50
		\$	Services Subt	otal \$	10,286.50

Expenses

100	TOTAL PROPERTY.	The second secon		
Date	Quantity	Descripti	on	Total

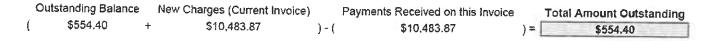
			44.50
07/12/2022	30.00	Copies: Copies	\$9.00
	56.00	Copies: Copies	\$16.80
		Copies: Copies	\$8.70

Time Keeper		CONTRACTOR OF THE PARTY OF THE	MICHAEL TO BE
THE RESIDENCE OF THE PARTY OF T	Hours	Rate	Total
Michelle Hauser	18.7	\$395.00	\$7,386.50
Michelle Hauser	4.0	\$337.50	\$1,350.00
Jack Salisbury	6.2	\$250.00	\$1,550.00
Jack Salisbury	1.8	\$0.00	\$0.00
		Subtotal	\$10,321.00

Interest

Туре	Date	SO NUTS STUBLE OF	Description	THE PLANT	Total
Interest	09/01/2022	Interest on overdue invoice #30265			\$162.87
				Interest Subtotal	\$162.87
				Subtotal	\$10,321.00
				Interest	\$162.87
				Total	\$10,483.87
				Payment (09/06/2022)	-\$10,286.50
				Credit Note	-\$197.37
				Balance Owing	\$0.00

Matter Financial Summary



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INVOICE

Invoice # 30914 Date: 08/31/2022

Eric Nelson 2911 Bella Kathryn Cir. Las Vegas, NV 89101

8109-0001

Nelson, Eric v. Nelson, Lynita(Post-Divorce)

Services

Date	Attorney	Description	Hours	Rate	Total
07/11/2022	JDJ	CONFERENCE WITH ATTORNEY HAUSER. TELEPHONE CONFERENCE WITH CO-COUNSEL.	1.10	\$500.00	\$550.00
08/01/2022	MAH	REVIEW AND REVISE OPPOSITION TO DEFENDANT'S MOTION.	0.50	\$395.00	\$197.50
08/09/2022	MAH	ATTEND MEETING WITH JL AND JJ RE: TRIAL STRATEGY.	1.80	\$250.00	\$450.00
08/25/2022	MAH	PREPARE MULTIPLE SCHEDULES FOR ELN TRUST BRIEF ON REMAINING ISSUES AND REVISE BRIEF.	1.00	\$395.00	\$395.00
08/25/2022	MAH	REIEW AND REVISE REPLY BRIEF.	0.50	\$395.00	\$197.50
08/26/2022	МАН	CONDUCT TELEPHONE CONFERENCE WITH JL RE: MOTION HEARING ON 8.30.32022	0.30	\$395.00	\$118.50
08/29/2022	МАН	PREPARE FOR HEARING ON 8.30.2022 INCLUDING REVIEWING ALL RELEVANT PLEADINGS ON FILE WITH THE COURT.	6.00	\$395.00	\$2,370.00

	TELEPHONE CALL WITH JL (3) HEARING PREP.			
	PREPARE OUTLINE FOR HEARING.			
08/30/2022 MAH	FINISH PREPARING FOR HEARING AND TRAVEL AND ATTEND HEARING BEFORE JUDGE SULLIVAN.	3.00	\$395.00	\$1,185.00
08/30/2022 MAH	TELEPHONE CALL WITH CLIENT RE: CASE STATUS AND NEXT MOVE.	0.20	\$395.00	\$79.00

Services Subtotal \$5,542.50

Expenses

Date	Quantity		Description	Total
08/09/2022	50.00	Copies: Copies		\$15.00
08/30/2022	17.00	Copies: Copies		\$5.10
			Expenses Subtotal	\$20.10

Time Keeper	Hours	Rate	Total
Michelle Hauser	11.5	\$395.00	\$4,542.50
Michelle Hauser	1.8	\$250.00	\$450.00
John Jones, Esq.	1.1	\$500.00	\$550.00
		Subtotal	\$5,562.60
		Totai	\$5,562.60
		Payment (09/14/2022)	-\$5,562.60
		Balance Owing	\$0.00

Matter Financial Summary

	Outstanding Balance		New Charges (Current Invoice)		Payments Received on this Invoice		Total Amount Outstanding
(\$554.40	+	\$5,562.60)-(\$5,562.60) =	\$554.40

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Carman & Price

8965 South Pecos Road Suite 9A Henderson, NV 89074

Ph:702-384-8900

Fax:702-384-6900

Eric Nelson 2911 Bella Kathryn Circle Las Vegas, NV 89117

February 1, 2023

Attention: eric@wydowns.com

File #:

NelEric1

Inv #: Settle

RE: Divorce/Post Divorce

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Apr-21-21	Continue working on discovery responses and related issues and discussion with J.H. re: Discovery	0.50	197.50	МАН
Apr-25-21	Review and respond to email correspondence from JL re: Response regarding responses to Request for Production of Documents	0.20	79.00	MAH
Apr-26-21	Review JPI issued by District Court re: New JPI that is different than the one issued by Judge Sullivan and Begin Reviewing	0.20	79.00	МАН
	Review Defendant, Lynita Sue Nelson's, Fourteenth Post Appeal Disclosure of Documents and Prepare email correspondence to JL re: Authenticity Objection and Related Issues	0.50	197.50	МАН
Apr-27-21	Review and Revise Plaintiff's Authenticity Objection and review and respond to email correspondence from JL re: Child and Support Brief, related Issues, and provide copy of Objection	0.40	158.00	МАН
	Continue preparing responses to Opposing Party's Request for Production of Documents	0.50	197.50	MAH
	Prepare Plaintiffls Authenticity Objection Under NRCP 16.2 and/or 16.205, review	1.40	245.00	SEP

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Invoice	4.	Settle
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	hearing video from April 13, 2021 hearing and prepare notes to attorney			
Apr-28-21	Begin Reviewing Defendant, Lynita Sue Nelson's, Fiftcenth Post Appeal Disclosure Of Documents and Telephone to JL regarding the documents produced, missing documents, etc.	0.75	296.25	МАН
	Prepare Plaintiffls Authenticity Objection Under NRCP 16.2 and/or 16.205, in regard to Defendantls Fifteenth Supplement	0.70	122.50	SEP
Apr-30-21	Review email correspondence from Opposing Counsel sent on 4.28.2021 at 8:16 p.m. at night, review file to determine the validity of the contents of email, telephone conference with JL and EN re: Expert Report, Responding to email, and other related items, and review and revise NRCP 16.2/205 Objection	1.50	592.50	МАН
	Prepare correspondence to client with copies of Plaintiffls Authenticity Objection Under NRCP 16.2 and/or 16.205 (filed 4/28/21 and 4/30/21)	0.00	0.00	МАН
May-01-21	Begin reading Anthem report and email report to JL, JH, and EN	0.50	197.50	МАН
May-03-21	Review and respond to multiple email's between EN and JL re: Scheduling Meeting, review and revise two subpoenas re: Anthem and Melissa, and prepare email correspondence to EN and JL re: Proposed Subpoenas	0.50	197.50	МАН
	Review email correspondence from JL re: Email regarding Lindell; Review file to determine whether a No Contact Order has been issued; continue reviewing Anthem Report, and Preparing Excel of Discovery	1.50	592.50	МАН
	Prepare Notice of Intent to Serve Subpoena Duces Tecum and Subpoena Duces Tecum for Anthem Forensics and Melissa Attonasio	1.20	210.00	SEP
		1.00	175.00	SEP
May-04-21	Review multiple emails from E.N. and telephone call with client J.L. re:	0.75	296.25	MAH

February 1, 2023

May-14-21	Telephone call with JL re: Child Support Brief	0.30	118.50	MAH
May-15-21	Review motion for Protection Order filed by Defendant	0.50	197.50	MAH
	Prepare correspondence to custodian of records for Anthem and Melissa Attanosio, and prepare correspondence to process server with documents for service	0.50	87.50	SEP
May-17-21	Review draft prepared by JL re: Child and Spousal Support Arrears and review and respond to email correspondence from JL to all involved.	0.50	197.50	МАН
	Review and respond to multiple email correspondence between	0.40	158.00	MAH
May-18-21	Brief Telephone call with JL re: Brief's and Related Issues	0.30	118.50	MAH
	Conference with MH re: issues and case strategy	0.40	160.00	MPC
May-19-21	Prepare email correspondence to JL re: Potential Additional Experts to consider	0.20	79.00	MAH
	S PERFORMANCE	0.60	240.00	MPC
May-26-21	Telephone conference with opposing counsel requesting extension to file Opposition to Motion to Compel and prepare correspondence to opposing counsel confirming extension	0.40	70.00	SEP
Jun-01-21	Prepare Opposition and Countermotion to Defendant's Motion for Protection Order	3.00	1,185.00	MAH
	Prepare Exhibit Appendix in Support of Opposition to Motion for Protective Order	0.80	140.00	SEP
Jun-02-21	Finalize Opposition and Countermotion and review and revise Appendix Exhibit. Review email correspondence from JL re: Telephone call with Josef	0.50	197.50	МАН
		0.40	160.00	MPC

Invoice #:

Settle

	prepare email to all counsel re: Status of OST ad Released Issues			
	Telephone call with JL, review email correspondence between counsel, and work on trial issues	1.00	395.00	MAH
	Revise Subpoena Duces Tecum to Anthem Forensics, Melissa Attanasio and Bertsch	0.60	105.00	SEP
Jul-15-21	Review email correspondence between JL and Expert Witness	0.20	79.00	MAH
Jul-19-21	Prepare email correspondence to Plaintiff's Team re: Scheduling Meeting and strategy issues. Respond to multiple email responses regarding the same. Prepare email correspondence to Josef re: Revised SDT's for his approval.	0.80	316.00	НАМ
	Review Defendant's First Supplemental Responses to First Set of Requests for Production of Documents. Prepare email correspondence to Josef re: Extension for Rebuttal Report and	0.50	197.50	MAH
Jul-20-21	Review and respond to email communications re: From the Court re: OST was granted and scheduling date. From JL and Team re: Scheduling Meeting for Friday.	0.30	118.50	MAH
	Review and respond to email correspondence from Department re: OST. Telephone call with JL re: OST and Related Issues. Begin preparing outline of meeting.	0.50	197.50	MAH
Jul-21-21	Review and respond to two email's from JL re: Hearing Strategy. Prepare email correspondence to Josef re: SDT's and Related Issues. Prepare Agenda for Meeting on Friday.	0.75	296.25	MAH
	Drafted email to MAH and JL re: concerns about OST and how to address with Court	0.20	80.00	MPC
Jul-22-21	Review and respond to email correspondence from JL re: Meeting on 7.23.2021 and	0.20	79.00	МАН

Settle

	Related Issues. Telephone call with JL and MC after Hearing re: Next Steps in Case.			
	Telephone call with JL and MC-Hearing Preparation. Prepare for Hearing before Judge Sullivan re: MSJ and Related Issues. Attend Hearing before Judge Sullivan re: MSJ and Related Issues. Telephone call with JL and MH after Hearing re: Next Steps in Case.	3.50	1,382.50	MPC
	Prepare hearing binder for hearing re: Motion for Summary Judgment and Motion for Protective Order	0.70	122.50	SEP
Aug-05-21	Two Telephone calls with JL re: Case Strategy.	0.30	118.50	МАН
	Prepare correspondence to court requesting hearing video	0.20	35.00	SEP
Aug-07-21	Review and respond to multiple emails from EN, JL, etc. Meeting with expert and child/spousal support issue.	0.30	112.50	MAH
	Review of email from client re: status	0.20	80.00	MPC
Aug-08-21	Review email correspondence from EN re: Case Issues	0.20	79.00	MAH
Aug-13-21	Text exchange with opposing counsel re: stipulation status; Approved stipulation	0.20	79.00	MPC
Aug-17-21	Review and respond to email correspondence between counsel re: Meeting with Expert Witness	0.20	79.00	MAH
	Begin preparing for meeting with Expert Witness on 8.18.2021	0.50	197.50	МАН
Aug-18-21	Attend Conference Call between MC, EN, JL, and Expert Witness re:	1.00	325.00	МАН
	Telephone conference with Expert	1.00	325.00	MPC
Aug-20-21	Prepare for meeting with JL, JH, and MC re: Defendant's motion filed on August 6, 2021.	2.00	650.00	МАН

	Review relevant NRCP, EDCR 1.9, case law, and history of case			
Aug-23-21	Telephone call with JL re: COA opinion regarding Malpractice against Burr. Discussion regarding Opposition and Correspondence from Opposing Counsel; begin preparing draft of Opposition and Countermotion to Defendant's Motion.	1.00	395.00	МАН
Aug-24-21	Prepare email correspondence to all counsel re: Status of Opposition, Brief, and Correspondence to Opposing Counsel	1.00	395.00	МАН
Aug-25-21	Prepare email correspondence to Josef K re: Extension to Prepare Opposition and Countermotion. Request granted.	0.20	79.00	MAH
		0.70	122.50	SEP
Sep-01-21	Telephone conference with Josh Hood re: obtaining copies of Otter transcripts for hearing	0.20	35.00	SEP
Sep-02-21	Review proposed Opposition to Lynita's motion to Compel, and Parties, etc.	0.50	197.50	MAH
	Continue preparing Joinder and Telephone call to JL re: Status of Case and Related Issues.	0.40	158.00	MAH
Sep-07-21	Review detailed email correspondence from Opposing Counsel re: Lindell. Review client's two email responses regarding Lindell. Brief Telephone call with JL re: Lindell and related issues.	0.50	197.50	МАН
Sep-08-21	Review email correspondence between JL and JK re	0.20	79.00	MAH
	Initial preparation for Anthem deposition	1.20	480.00	MPC
Sep-09-21	Prepare meeting with MC and JL re: Case Strategy and Issues. Prepare email correspondence to EN re: Hearing. Prepare email correspondence to JL re: Deposition Dates.	2.50	812.50	МАН

	Review and revise Notice of Deposition and Supboena to Anthem and prepare email correspondence to counsel re: Approval of Subpoena and Notice of Deposition	0.30	118.50	МАН
	Review of file in preparation for meeting with JL and MAH; Attended meeting with JL and MAH	1.80	540.00	MPC
	Prepare Subpoenas to Jennifer Allen & Joseph Leauanae, and prepare Notice of Taking Deposition re: same	1.50	262.50	SEP
Sep-10-21	Prepare correspondence to process server with Deposition Subpoenas for service, and prepare correspondence to Depo International re: scheduling court reporter	0.30	52.50	SEP
Sep-13-21	Review email correspondence from Department re: Rescheduling Hearing. Brief Telephone call with MC and JL re: Rescheduling Hearing	0.30	118.50	МАН
Sep-14-21	Prepare email correspondence to Department re: MC and MH unavailable for 10.15.2021 hearing. Prepare email correspondence to client re: Status of Hearing and Related Issues. Review and respond to email correspondence from JL re: Hearing being moved and issues with Anthem deposition.	0.30	118.50	МАН
	Review and respond to email correspondence from client re: Status of 9.15.2021 hearing, deposition(s) of Anthem and related Issues. Review JL's email correspondence to Department re: 9.15.2021 and email discussion regarding the same.	0.30	118.50	МАН
	Review and respond to JK email response to the department re: Hearing scheduled for 9.15.2021 and continuing the same	0.20	79.00	МАН
	Review of follow-up email from client re:	0.20	60.00	MPC
Sep-15-21	Review and respond to email correspondence from Judge Sullivan's LC re: Status of Hearing and Related Issues. Review and respond to email correspondence from client re: Depositions of Anthem.	0.50	197.50	МАН

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	Review and respond to additional email from Judge Sullivan's LC re: New Potential Hearing dates and prepare email correspondence to JL and MC ordering transcript of August 2021 hearing	0.20	79.00	МАН
	Brief Telephone call with JL re: Status of Case and hearing that did not occur on 9.15.2021. Review email correspondence from Department's LC re: New Proposed Hearing date. Begin drafting correspondence to JK re: Outstanding Issues	0.50	197.50	МАН
	Drafted email to client re: deposition strategy	0.40	160.00	MPC
Sep-16-21	Review and respond to multiple email's between JL, MC, and EN re: Status of Case. Depositions and Related Issues. Review and respond to email correspondence from JK re: Deposition of Anthem	0.50	197.50	МАН
		0.20	80.00	MPC
		0.20	80.00	MPC
Sep-17-21	Prepare Proof of Service re: service of Deposition Subpoenas (2xls), and prepare Banone LLC binder	1.25	218.75	SEP
Sep-20-21	Review and revise two Proof of Service re: Depositions of Joe and Jenny at Anthem	0.20	79.00	МАН
Sep-27-21	Review and respond to email correspondence from client re: Status of Pending Issues before District Court	0.20	79.00	МАН
Sep-28-21	Review and respond to email correspondence from JK re: Deposition of Anthem and subpoena to Anthem	0.20	79.00	MAH
Sep-30-21	Review multiple emails re: Email from ER. Response from JL, JL's email to JK, Emails between Law Clerk and JL. Telephone call with JL re: Status of Case and Related Issues.	0.75	296.25	MAH
Oct-01-21	Review email from JL re: Review and respond to email from Discovery Commissioner re: hearing next week. Telephone call to JL re: Status of Case.	0.50	197.50	МАН

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	Review	v of email from client	re: case overview	0.20	65.00	MPC
Oct-04-21	corresp	e drop box link and prondence to Jeff Lusze hearing video	repare eck, Esq., with	0.20	35.00	SEP
Oct-12-21	telepho: correspo	FFCL re: Motion in ne call with JL, and p ondence to all Counse Hearing on 10.13.202	repare email el re: Meeting	0.75	296.25	МАН
	Review Judge S	of Summary Judgme ullivan	nt Decision from	0.40	130.00	MPC
Oct-13-21	with MO	for and participate in C and JL re: Court's D ry, and Relat	ecision,	0.50	168.75	MAH
	Judge Si date, rev correspo prepare e Court an Notice of Jenny. Pr Prepare I Jenny. P	and respond to multipullivan's LC re: Reschiew and respond to endence from JK re: Elemail correspondence d Deposition dates. If Deposition for Anthrepare revised SDT to Deposition Subpoena repare email corresponse Revised documents attion.	peduling hearing mail Deposition dates, to EN re: New Prepare Amended em re: Joe and Anthem. To Joe and ondence to MC	2.50	987.50	МАН
	Telephon decision :	e conference with Ma and case status	AH and JL re:	0.80	260.00	MPC
Oct-14-21	EN, MC, between (nd respond to multipl and JL re: Scheduling Counsel and EN. Convery Issues.	g Meeting	0.50	197.50	МАН
Oct-15-21	Depositio	working on Discover n, Subpoena, and SD A-Case to work on I	T. Begin	1.00	395.00	MAH
×	with Amer scheduling attorney re	orrespondence to Deponded Notice of Depos g new dates; conference: proper service of su comments for process:	sitions for ce with lbpoenas,	0.60	105.00	SEP

	service on Anthem Forensics and prepare facsimile cover sheet with subpoenas			
Oct-19-21	Review email correspondence from email correspondence to MC, JL, and EN re: Scheduling Meeting. Prepare email correspondence to JK re: Discovery Issues.	0.50	197.50	МАН
	Begin preparing file for Deposition of Anthem, Hearing on 10.25.2021, Trial, and Related Hearings for MH and MC to prepare for all	2.00	350.00	SEP
Oct-20-21	Continue preparing file for MC and MH to prepare for deposition, trial, etc.	0.70	122.50	SEP
Oct-22-21	Continued preparation for deposition of Joe Leauanae; Prepared for hearing in Department O	1.60	640.00	MPC
Oct-25-21	Prepare for and attend Court Hearing before Judge Sullivan re: Defendant's Motion to Add Third Parties and Related Issues. Review and respond to email correspondence from JK re; SDT of Anthem. Telephone conference with JL and MC re: Prepare correspondence to Opposing Counsel re:	3.50	1,181.25	МАН
	Conference with MAH re: hearing; Email exchange and telephone conference with opposing counsel re: Anthem subpoena; Attended online hearing in Department O	2.40	780.00	MPC
	Follow-up telephone conference with opposing counsel re: scope of subpoena; Revised subpoena; Follow-up email exchange with opposing counsel re: subpoena and rescheduling of depositions	0.60	240.00	MPC
	Follow-up telephone conference with MAH and JL re: case issues and strategy	0.40	130.00	MPC
Oct-26-21	Begin preparing draft of Motion to Continue Expert Deadline.	0.50	197.50	МАН
	Prepare correspondence to court requesting hearing video for 10/25/21 hearing, prepare Second Amended Deposition Subpoenas for Joseph Leauanae and Jennifer Allen, prepare Second Amended Notice of Taking	2.80	490.00	SEP

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Deposition of Joseph Leauanae and Jennifer Allen, download hearing video and prepare transcription of video via Otter, prepare drop box containing hearing videos and Otter-transcription, and prepare correspondence to Luszecklis office with link to drop box, and download pleadings and discovery documents provided by Luszecklis office

		2.50	437.50	SEP
Oct-27-21	Continue downloading of pleadings to update file, prepare correspondence to opposing counsel and Anthem Forensics with Second Amended Deposition Subpoenas for J. Leauanea and J. Allen, and Amended Deposition Subpoena Duces Tecum to Anthem Forensics, and prepare correspondence to Depo International with Deposition Notices for resetting, and revise Deposition Subpoena and Notice re: Jennifer Allen correcting date	1.75	306.25	SEP
Oct-28-21	Review and respond to email correspondence from JK re: Lindell Property Management, Stipulation and Order re: SDT, and additional time to file brief. Prepare email correspondence to EN re: Lindell Property Management Issue.	0.30	118.50	МАН
	Prepare correspondence to opposing counsel and Anthem Forensics with Third Amended Deposition Subpoena for Jennifer Allen, prepare correspondence to Depo International regarding rescheduling Ms. Allends deposition, and prepare draft of Stipulation and Order	0.80	140.00	SEP

Nov-01-21	Review clientls pleading files re: documents provided by Luzseck and still remaining to be saved to data file	0.80	N/C	SEP
Nov-02-21	Review Eric's email correspondence re: Motion LN filed and his comments. Review JL email response and respond to the same.	0.30	118.50	МАН
	Continue preparing draft of Motion to Continue deadline.	0.30	118.50	МАН
Nov-03-21	Review and revise Stipulation and Order re: Discovery Issues, etc. Prepare email correspondence to JL, JH, and MC re: Stipulation and Order for Review and Consideration. Prepare email correspondence to JK re: Stipulation and Order for Review and Consideration. Finish preparing draft of Discovery Motion re: Extension of Rebuttal Expert Deadline.	3.00	1,185.00	MAH
	Telephone conference with Allie at Luzseckls office rc: requesting copy of Response to Requests for Production of Documents (left message), and prepare follow up correspondence re: same	0.00	N/C	SEP
Nov-04-21	Finalize Motion re; Extend Discovery Deadline and Exhibit Supplement. Brief telephone call with JL re: Joinder to Motion.	0.50	197.50	МАН
	Prepare Exhibit Appendix in Support of Motion to Continue Discovery Deadline for Rebuttal Expert Witness Report	0.65	113.75	SEP
Nov-05-21		0.20	80.00	MPC
Nov-08-21	Additional deposition preparation	0.60	240.00	MPC
Nov-09-21	Review and respond to email correspondence from Jenny at Anthem re: Documents received and COR needs to be notarized. Prepare email to JL and MC re: Documents received from Anthem and other related issues. Review multiple emails between counsel re: Extension to file Opposition and prepare email to JK re: Stipulation and order re: Discovery	0.30	118.50	МАН

	Download documents provided by Anthem Forensics in response to subpoena	0.40	70.00	SEP
Nov-10-21	Begin processing of documents from Anthem Forensics and outline Plaintiffls Disclosure of Documents	1.20	210.00	SEP
Nov-11-21	Continue work on producing documents from Anthem Forensics	1.60	280.00	SEP
Nov-12-21	Continue drafting production regarding Anthem documents	0.40	70.00	SEP
Nov-15-21	Advance Payment of Cost for Depo International re: Deposition of Anthem Experts	1.00	3,000.00	МАН
Nov-16-21	Continue preparing for Deposition of Joe from Anthem-review documents provided. Review Custodian of Records provided by Jenny. Telephone call with JL re: Case Strategy	1.00	395.00	MAH
	Prepare for and attend Court Hearing before Judge Sullivan re: Extension for Rebuttal Expert Report	1.50	N/C	MAH
	Review of file in preparation for hearing in Department O; Attended hearing in Department O	1.20	480.00	MPC
Nov-17-21	Prepare exhibits for deposition	1.50	262.50	SEP
Nov-18-21	Finish preparing for deposition of Joe and continue preparing for Evidentiary Hearing and Trial	1.00	395.00	МАН
	Review of questions from DW; Review of Anthem document production; Final preparation for deposition	1.80	720.00	MPC
	Conducted deposition of Joe Leauanae; Follow-up conference with MAH and JL	6.00	2,025.00	MPC
Nov-19-21	Finish preparing for deposition, brief telephone call with JL re: Anthem Fees and attend Deposition of JL from Anthem	6.00	2,025.00	MAH
Nov-22-21	Continue work on Disclosure of Anthem documents	1.70	297.50	SEP
Nov-23-21	Review correspondence prepared by JL re: Prepare email	0.50	197.50	МАН

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	correspondence to client re: Jenny's deposition and Related Issues. Prepare email correspondence to all counsel re: Stipulation and Order and New Hearing date.			
	Telephone conference with Tia from Esquire solutions re: scheduling court reporter, and prepare correspondence to her re: same	0.20	35.00	SEP
Nov-24-21	Telephone call to JL re: Deposition and moving time. Prepare email correspondence to Counsel re: Moving Time for Deposition of Jenny from Anthem.	0.30	118.50	МАН
Nov-29-21	Review and respond to email correspondence from Department's LC re: New Hearing date. Two brief telephone calls with client re: Status of Case. Begin deposition of Anthem-Jenny-including telephone call to Discovery Commissioner and arguing discovery issue before Discovery Commissioner. Attend portion of deposition until 2:00 p.m.	3.00	1,012.50	MAH
Nov-30-21	Review and respond to email correspondence from Department's Law Clerk re: Rescheduling of Defendant's pending motion	0.20	79.00	МАН
Dec-02-21	Continue drafting disclosures re: documents from Anthem	0.80	140.00	SEP
Dec-06-21	Email exchange with JL re: Anthem report rebuttal and need for telephone conference	0.20	80.00	MPC
	Prepared for and attended telephone conference with MH and JL	0.80	270.00	MPC
	Review of email from JL re: civil case; Preliminary review of documents in civil case	0.60	240.00	MPC
	Email exchange with JL re: rebuttal to Anthem report and need for telephone conference	0.20	80.00	MPC
Dec-10-21	Review multiple emails between counsel re: Property Management Lease, Review Property Management Lease, Prepare for and Conduct Telephone conference with all counsel.	1.50	506.25	MAH
Dec-13-21	Review answers to Interogs provided by Defendant re: Trial Witness List.	0.20	79.00	MAH

	Reversal of Nov-15-21 time entry for Advance Payment of Cost for Depo International re: Deposition of Anthem Forensics (expense paid Dec-09-21)	1.00	-3,000.00	МАН
Dec-15-21	Telephone conference with Eduardo at Karacsonyi's office re: password for documents provided to Anthem	0.20	35.00	SEP
Dec-20-21	Review multiple email correspondence re: New Management Lease, Extension to file Rcply, and email from Jenny with additional information. Prepare email to Jeff and Mike re: Additional documents from Anthem.	0.50	197.50	МАН
	Review email correspondence from JK re: Lindell Issues. Prepare email correspondence to Eric re: Lindell Issues	0.20	79.00	МАН
Dec-21-21	Review two email correspondence from EN and Revised Lease Agreement	0.30	118.50	MAH
	Continue draft of Disclosure of Anthem documents	1.50	262.50	SEP
Dec-22-21		0.50	197.50	МАН
	Continue draft of production of Anthem Forensic's documents	2.20	385.00	SEP
Dec-23-21	Continue draft of production of Anthem Forensic's documents	3.00	525.00	SEP
Dec-27-21	Continue draft of Disclosure of Anthem Documents	0.30	52.50	SEP
Dec-28-21	Continue work on production of documents from Anthem	0.70	122.50	SEP
Dec-29-21	Continue draft of Disclosure of Anthem Documents	0.40	70.00	SEP
Dec-30-21	Continue draft of Disclosure of Anthem Documents	1.80	315.00	SEP
Jan-03-22	Continue draft of Disclosure of Anthem Documents	3.40	595.00	SEP
Jan-04-22		0.50	197.50	MAH

	Jenny's deposition, and Related issues			
Jan-05-22	Review email correspondence from JK to Department's LC. Prepare email correspondence to Eric, MC, and JL re: Appearing in person.	0.20	79.00	МАН
	Continue draft of Disclosure of Anthem Documents	3.20	560.00	SEP
Jan-06-22	Review and respond to email correspondence from EN re: Hearing, Child Support, and Related Issues.	0.30	118.50	МАН
	Continue draft of Disclosure of Anthem Documents	4.25	743.75	SEP
Jan-07-22	Review of Status Report filed by opposing counsel	0.20	80.00	MPC
	Finish draft of Plaintiff's Disclosure of Documents	1.00	175.00	SEP
Jan-10-22	Review multiple emails from Friday, January 7, 2021, re: Lease for Lindell. Review Defendant's unauthorized Brief filed on Friday at 11:40 p.m. and exhibits. Telephone call with Jeff and Mike re: Unauthorized Brief and Hearing on 1.11.2021. Review multiple emails from client re: Expert Report, Defendant's Brief and Related Issues. Prepare email correspondence to all re: BlueJeans Link.	1.20	474.00	МАН
	Telephone conference with JL and MAH	0.40	160.00	MPC
Jan-11-22	Attend Hearing before Judge Sullivan and Telephone conference with JL and MC re: Next Steps in the case-Discovery and Related Issues	1.50	506.25	МАН
	Review of file; Prepared for hearing in Department O	1.00	400.00	MPC
	Attended hearing in Department O	0.80	320.00	MPC
	Follow-up telephone conference with JL and MAH	0.40	160.00	MPC

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Jan-14-22	Continue preparing for Trial re: Organization of File to pull exhibits and related documents	1.40	245.00	SEP
Jan-18-22	Review multiple emails between JL and JK. Review documents provided by JL to Expert. And, respond to email re: Deposition of Defendant.	0.50	197.50	МАН
	Review Court's Decision on Child/Spousal Support. Review new Management Option for Lindell. Telephone call with JL re: Property Manager	0.75	296.25	MAH
Jan-19-22	Review and respond to email correspondence re: Property Manager	0.20	79.00	МАН
	Begin reviewing NRCP 16.205 Production of Documents. Review and respond to multiple email's re: Property Manager, Deposition, and Related Issues.	1.00	395.00	МАН
Jan-20-22	Review and respond to multiple email correspondence re: Property Manager Issue. Telephone call with J	1.00	395.00	МАН
Jan-21-22	Finish reviewing NRCP 16.205 production of documents and begin reviewing documents	0.50	197.50	МАН
Jan-24-22	Review multiple emails re: Property Manager. Review documents provided by Sun Property Management. Prepare email correspondence to client re: Documetns from Sun Property Management.	0.50	197.50	МАН
	Begin Reading Exam of Larry, and Telephone call with JL re: Trial Issues	1.50	506.25	MAH
	Reviewed rebutttal report	0.80	270.00	MPC
	Revise Plaintiffls Disclosure of Documents and begin creating files re pertinent documents from Anthem	2.50	437.50	SEP
Jan-25-22	Review checks provided by prior management company. Prepare email to EN re: Questions regarding checks. Prepare for meeting with MC and JL.	0.50	197.50	МАН

	Attend meeting with JL and MC re: Rebuttal Report	0.80	270.00	МАН
	Zoom conference with JL and MAH re: expert report	0.80	270.00	MPC
	Re-reviewed report and added revisions for JL and MAH review	0.40	135.00	MPC
Jan-26-22	Review and respond to email correspondence from client re: Management Issue	0.20	79.00	MAH
	Review draft of correspondence to JK re: Child Support Issue.	0.20	79.00	MAH
		0.75	296.25	МАН
	Prepare subfile with specified documents from Anthem per MAH	0.75	131.25	SEP
Jan-27-22	Review and respond to email correspondence from EN re: Reviewing Lease. Prepare email correspondence to JK re: Attached Lease. Telephone call with JL re: Lindell Lease, JPI, and Related Issues	0.75	296.25	МАН
Jan-28-22	Review revised Rebuttal Report. Telephone call with JL and MC re: Rebuttal Report, JPI, property management issues, etc.	1.00	337.50	MAH
	Telephone conference with MAH and JL re: expert report.	0.20	79.00	MAH
	Telephone conference with MAH and JL re: expert report	0.20	67.50	MPC
Jan-31-22	Review and edit proposed Motion for Reconsideration. Prepare two separate charts for interest payments.	0.50	0.00	MAH
Feb-01-22	Review Motion for OSC re: JPI issues. Research issues presented by Opposing Counsel.	0.75	296.25	МАН
	Multiple telephone calls with JL re: Motion for Reconsideration, Motion for OSC, and Related Issues. Review and revise Motion for Reconsideration filed on behalf of EN and ELN Trust.	1.20	0.00	МАН

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	Review of propos Telephone confere reconsideration; F motion to JL	ence with N	MH and JL re:	1.20	480.00	МРС
	Drafted Motion to	Reconside	er	1.60	640.00	MPC
Feb-02-22	Prepare email corr Trust Issues, Depo Review multiple e Related Issues.	sition, and	Related Issues.	0.50	197.50	МАН
	Review of email fr decision	om client r	re: Sullivan's	0.20	80.00	MPC
	Drafted email to op continuance	oposing cor	unsel re: need for	0.20	80.00	MPC
	Follow-up email ex counsel re: need for			0.20	80.00	MPC
	Reviewed and resp re: ongoing items to			0.20	0.00	MPC
Feb-03-22	Review Duties Own License, PM Agree Agreements for Lin correspondence from deposition of Oppo	ment, and (idell and re m client re:	Other spond to email	0.50	197.50	MAH
	Review and respond from JK re: Continu call with JL re: Con Documents from Pr for Lindell	ing Hearin	ng and Telephone aring and	0.30	118.50	МАН
	Review Court's Dec re: Defendant's Mot Countermotion in L	ion for Cla		0.20	79.00	MAH
		ALC: THE	建 为社	0.50	197.50	MAH

Process Documents received by SDT to Cotton

Prepare for and attend conference call with

MC and JL re: Opposition to OSC, Motion to Continue, Deposition, and Related Issues

for Attorney review

Feb-04-22

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337.50

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	Drafted follow-up email to opposing countre: need for continuance	sel 0.20	80.00	МРС
		0.20	80.00	MPC
	Process Documents received by SDT to Co for Attorncy review	tton 2.00	250.00	LA
Feb-07-22	Review email correspondence between JL a Cotton re: Information regarding prior Leas Agreement and Monies.	and 0.20 e	0.00	МАН
	Review information provided by Susan Cot re: Past Due Property Taxes	ton 0.20	0.00	МАН
		0.20	80.00	MPC
	Drafted motion to continue	1.40	560.00	MPC
Feb-08-22	Review Amendment to Counterclaims so as Include New Claims Against NBGS, Notice Intent to Serve SDT to Nevada State Title an Rubin Brown and email correspondence by Irel: SDT and related Issues	of d	197.50	МАН
Feb-10-22	Prepare for and attend meeting with JL and MC. Review and respond to email correspondence from EN re: Status of Case, Review records from SDT to Northcap. Beg reviewing Request for Production of Documents propounded by Defendant.	1.90 in	0.00	МАН
	Drafted email to Court re: ex parte motion	0.20	80.00	MPC
	Telephone conference with JL and MAH	0.60	240.00	MPC
	Review of email from JL's office re: subpoena Drafted email to JL and MAH re: subpoena	a; 0.20	80.00	MPC
	Review of email from client re: update	0.20	80.00	MPC
	Prepare draft of Responses to Second Post Appeal Request for Production of Documents for Atty review	0.60	75.00	LA
Feb-14-22	Telephone conference with JL re: pending motions	0.20	80.00	MPC

Feb-15-22	Review and respond to email correspondence from Department re: Rescheduling Hearings	0.20	79.00	МАН
	Trial Retainer and Deposition Retainer	0.00	7,500.00	МАН
	Assist with preparing draft of Opposition to OSC	1.00	125.00	LA
Feb-16-22	Prepare email correspondence to client re: New Hearing date and Counsel for LLC	0.20	79.00	МАН
	Begin preparing draft of Opposition to OSC.	1.00	395.00	MAH
Feb-17-22	Finish drafting Opposition. Review and respond to two emails from EN.	1.50	592.50	МАН
Feb-18-22	Finalize Opposition and prepare for Telephone Conference with MC and JL.	0.75	296.25	MAH
	Attend Telephone Conference with MC and JL	0.75	253.13	МАН
	Review of case outline email from JL; Prepared for telephone conference; Telephone conference with MAH and JL	1.20	480.00	MPC
	Brief telephone conference with JL re: Bertsch motion	0.20	80.00	MPC
	Reviewed and revised opposition	0.40	160.00	MPC
Feb-22-22	Review email correspondence from client re: Case Related Issues.	1.00	395.00	МАН
Feb-28-22	Review multiple emails re: Client email, Deposition email, and begin preparing motion for Protective Order re:	0.50	197.50	МАН
	Worked on organizing e-mails chronologically. Worked on scheduling court reporter and videographer. Telephone call to opposing counsel to cancel 3/1/22 deposition of Lynita Nelson. Telephone call to Jeffrey Luszeck, Esq. to inform deposition of Lynita Nelson is cancelled and is being rescheduled. Scheduled court reporter and videographer for 3/3/22 deposition of Lynita Nelson. Prepared Notice	0.70	N/C	LA

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	of Rescheduling of Taking Deposition of Defendant, Lynita Sue Nelson			
Mar-01-22	Prepare motion for Protective Order re: Winters. Prepare email correspondence to Josef re: Winters deposition. Respond to email correspondence from Josef re: Money held by FCP. Prepare email correspondence to Winters re: Confirmation no Subpoena was served.	2.00	790.00	МАН
	Lengthy file review in preparation of deposition; Prepared for deposition of opposing party [3.8 No Charge]	2.60	1,040.00	МРС
Mar-02-22	Review and respond to email correspondence from JK re: Winters deposition and Discovery Motion. Prepare and respond to multiple email correspondence with Winters re: Subpoena. Telephone call with client re: Deposition and Request for Production of Documents. Prepare email correspondence to client re: Request for Production of Documents. Telephone call with JL office re: Winters Subpoena and Request for Production of Documents. Prepare email correspondence to JL's office re: Responses to Request for Production of Documents. Attend Joint Meeting with all Counsel re: Deposition Issues and service onto LLC. Multiple telephone calls with Discovery Commissioner re: Hearing on Discovery Issue. Coordinate Discovery Conference on 3.8.2022. Second telephone call with client re: Additional Information for Deposition-Participated with MC. Continue preparing for Deposition of Defendant. Prepare email correspondence to Discovery Commissioner and All counsel re: Discovery Hearing-multiple emails.	3.00	1,185.00	МАН
	Review of client notes re: possible deposition avenues; Ctd. preparation for deposition	1.60	640.00	MPC
	Telephone conference with MAH and client re: deposition overview	1.50	600.00	MPC
	Drafted email to JL and opposing counsel restatus of deposition and concerns; Telephone conference with opposing counsel and JL restdeposition concerns	0.40	160.00	MPC

Mar-03-22	Telephone call with JL and MC re: Discovery Hearing. Attend Discovery Hearing with MC and all Counsel re: Deposition issues. Prepare report and recommendation from Discovery Hearing. Prepare email correspondence to MC and JL re: Draft of Report and Recommendation. Participate in Telephone call with JL and MC and client after discovery hearing re: Update from Hearing.	1.50	487.50	МАН
	Telephone conference with JL and MAH re: discovery issues; Prepared for and attended discovery hearing; Follow-up telephone confrence with client re: discovery status; Email exchange with counsel re: possible deposition dates; Reviewed and revised R&Rs	1.80	720.00	MPC
	Telephone call to Esquire to cancel court reporter and videographer. Worked on downloading Rubin Brown SDT responsive documents in scans and data files. Prepared notice to vacate motion for protective order.	0.30	N/C	LA
Mar-04-22	Email exchange with JL re: hearing strategy; Telephone conference with JL re: hearing strategy; Drafted email to client re: hearing strategy	0.80	320.00	MPC
	Review of file and prepared for hearing in Department O	0.80	320.00	MPC
Mar-05-22	Follow-up email exchange with client re: hearing strategy	0.40	160.00	MPC
Mar-07-22	Telephone call with JL and MC re: Hearing Preparation. Attend Hearing before Judge Sullivian re: Multiple Motions re: Protective order, LLC, OSC, and Related Issues	4.00	1,350.00	МАН
	Review Malpractice Lawsuit for additional information for Deposition for Defendant.	0.50	197.50	MAH
20	Telephone conference with JL and MAH re: upcoming hearing status; Attended hearing in Department O	4.20	1,680.00	MPC
	Review of malpractice pleadings; Revised deposition outline	0.40	160.00	MPC
Mar-08-22	Review and revise Amended Deposition Notice. Prepare email correspondence	0.30	118.50	МАН

	to Winters re: Deposition scheduled for next week.			
Mar-09-22	Reversal of Feb-15-22 time entry for Advance Payment of Trial Retainer and Deposition Retainer (pd Mar-1-22)	1.00	-7,500.00	МАН
	Review multiple emails from all counsel. Continue preparing for Evidentiary Hearing.	0.50	197.50	МАН
	Final preparation for opposing parties' deposition	0.40	160.00	MPC
	Prepare email correspondence to Jeff Luszeck and Allie Carnival re: videos and Transcript re: March 7, 2022 hearing to Jeff Luszeck and Allie Carnival and Create dropbox link for all documents	0.50	62.50	LA
Mar-10-22	Begin reviewing 17th Disclosure of Documents and Anthem Fee Agreement and Billing statements	0.50	197.50	MAH
	Pre-deposition conference with client and JL; Conducted deposition of opposing party; Follow-up conference with client and JL	6.00	2,400.00	MPC
Mar-11-22	Review Lindell Accounting provided by Defendant and Finalize Responses to Request for Production of Documents.	0.50	197.50	MAH
	Prepare for and Attend Meeting with MC and JL	2.00	N/C	MAH
	Telephone conference with MAH and JL re: trial strategy	1.20	480.00	MPC
	Telephone conference with MAH and JL re: trial strategy	1.20	480.00	MPC
Mar-13-22	Prepare for and conduct telephone conference with client and JL re: Deposition of Client by Defendant on 3.14.2023	1.00	395.00	МАН
Mar-14-22	Travel to and Attend Deposition of Defendant. Attend Hearing before Judge Sullivan re: Deposition Issues.	8.50	3,357.50	,MAH
	Trial Retainer-Two Week Trial on Community Property Issues.	0.00	10,000.00	МАН

				, ,, 2025
Mar-15-22	Attend Hearing before Judge Sullivan and Telephone Conference between Counsel at the Conclusion	1.00	337.50	МАН
	Review and respond to multiple emails between counsel and continue trial prep-PTM, Review prior testimony, and Related Issues	1.50	592.50	МАН
	Courtesy Discounts - Deposition Cancellations	0.00	-835.00	MAH
Mar-16-22	Travel to and attend Deposition of D. Winters. Meeting with JL after deposition re: Trial Strategy.	4.00	1,580.00	МАН
		0.40	160.00	MPC
	Reviewed/Download/Saved Emergency Hearing Video held on 3-14-22, Prepared/ Formatted Pre-trial Memorandum for Attorney Fees, and Reviewed/Downloaded/ Saved Motion hearing video held on 3-15-22	1.00	0.00	LA
Mar-18-22	Zoom conference with MAH and JL	1.20	480.00	MPC
	Ctd. trial preparation; Review of property information and trial exhibits; Revised trial outlines	2.20	880.00	MPC
Mar-21-22	Review and respond to email correspondence from Law Clerk re: Change in Trial Dates. Continue trial preparation of re: PTM, reviewing exhibits, and related issues.	0.50	197.50	МАН
	Travel to and Attend meeting with DG, MC, and JL	2.40	810.00	МАН
	Meeting with JL, MAH, and Joe Garety	2.40	810.00	MPC
Mar-22-22	Finalize PTM for review by client and all counsel. Continue with trial preparation of re: Review of transactions, deposition, Motion for Burden of Proof, Opposition, and Reply. Review Anthem's Report for additional questions. Review Winter's deposition, etc. Prepare email correspondence to all re: PTM.	3.50	1,382.50	МАН

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	law, SST's, SPA, SPT, and related Issues. (Actual Time 10 hours only billed for 4 hours)			
Mar-27-22	Continue preparing for Evidentiary Hearing re: LB cross examination, DG testimony, Conference Call with DG and JL-2.50, multiple communications with JL, and related Issues- (Actual Time Spent 10.00-DID NOT BILL ALL TIME)	4.00	1,350.00	МАН

4.00

1,350.00

file, and Reviewed email from Dept O, Updated CSL and Calendar with trial date

Multiple Telephone Calls with JL re:

Evidentiary Hearing. Continue preparing for Evidentiary Hearing. Reviewing Defendant's Exhibits, PTM, LB Information, relevant case

changes

Mar-26-22

MAH

	_			, 1, 2025
	Ctd. trial preparation; Forwarded Anthem cross to JL and MAH for additional input; Forwarded Lynita cross to JL and MAH for additional input	1.60	632.00	МАН
Mar-28-22	Travel to and Attend Day One of Evidentiary Hearing. Participate in Conference call with MC and JL. Continue preparing for Evidentiary Hearing.	8.80	2,970.00	МАН
	Travelled to and attended trial in Department O	8.00	2,700.00	MPC
	Zoom meeting with JL, MAH, and client	0.80	270.00	MPC
	Created Binder of Larry B. Involvement for Attorney Fees and Downloaded and saved prior Trial Transcripts in Scan and data	2.00	250.00	LA
Mar-29-22	Travel to and Attend Day Two of Evidentiary Hearing. Participate in Conference call with MC and JL. Continue preparing for Evidentiary Hearing.	8.40	2,835.00	МАН
	Email exchange with JL re: property transactions	0.20	80.00	MPC
	Travelled to and attended hearing in Department O	7.80	2,632.50	MPC
	Zoom conference with MAH and JL	0.60	202.50	MPC
Mar-30-22	Travel to and Attend Day 3 of Evidentiary Hearing before Judge Sullivan	7.20	2,430.00	MAH
	Email exchange with JL and MAH re: trial preparation	0.40	135.00	MPC
	Travelled to and attended hearing in Department O	7.20	2,430.00	MPC
	Email exchange with JL and MAH re: trial preparation	0.40	135.00	MPC

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	Create videos	d dropbox link of day and otter transcripts t	one hearing o send to Attys	0.50	62.50	LA
	otter tr dropbo and rev	oaded and saved Hear anscripts from 3.29.22 ox link to email to Atto view 3/29/22 Hearing ge from OC for Atty	2 and Created orney Service Fee	1.00	0.00	LA
Mar-31-22	informa	v 2010 Trial transcripts ation on trusts and Re- pts for background in	view 2010 Trial	4.00	500.00	LA
Apr-01-22	trial; Re testimor reference of email	of video transcripts in evised trial outlines to my; Review of disclosures to entities discussed from client re: status of Anthem documents	address ures for d at trial; Review	2.20	880.00	MPC
	Zoom co	onference with MAH :	and JL	0.80	270.00	MPC
	draft of s including 2012 Tris	oom meeting with Att second 16.205 for atty g bate label document al Transcript for infor examination of witnes	review, s, and Research mation about the	1.00	125.00	LA
Apr-02-22				0.20	80.00	MPC
Apr-03-22	preparation	of emails from JL re: to on; Zoom conference red follow up question	with MAH and	1.60	540.00	MPC
Apr-04-22	Travelled O	to & attended hearing	g in Department	7.60	3,002.00	МАН
	Travelled Departme	to and attended hearin nt O	ng in	7.60	2,565.00	MPC
Apr-05-22	Ctd. trial poutline	preparation; Revised A	Anthem cross	0.80	320.00	MPC

	Zoom conference with MAH and JL	0.60	202.50	MPC
	Downloaded and saved Hearing video and otter transcripts to data and scan file and created Dropbox link of the Hearing video and otter transcripts for Jefills office	1.50	N/C	LA
Apr-06-22	Travelled to & attended trial in Department O	6.00	2,370.00	МАН
	Revised Allen cross; Travelled to and attended trial in Department O	7.40	2,960.00	MPC
	Email exchange with JL re: Anthem report	0.20	0.00	MPC
	Review and search for bank statements for Atty for cross examination of Jenny and Defendant	1.50	187.50	LA
Арт-07-22	Travelled to & attended Hearing in Department O	6.60	2,607.00	МАН
	Travelled to and attended hearing in Department O	6.60	2,227.50	MPC
		0.20	0.00	MPC
Apr-08-22		0.20	0.00	MPC
Apr-11-22	Updated Calendar and CSL with new Trial Dates. Download and save Hearing video and otter transcript in Data and scan file / created dropbox link of hearing video and transcripts, sent out to Attyls and Attyls staff.	2.00	N/C	LA
Apr-12-22	Download/save Hearing video and Otter transcripts. Create dropbox link for other Attorneyss	0.00	N/C	LA
Apr-15-22	Begin preparing for Next Day of Evidentiary hearing re: Defendant's Bank records and related issues.	2.00	790.00	МАН
	Courtesy Discounts - per MAH	0.00	-1,344.82	МАН

				, ,, 2023
Apr-18-22	Review of JL's Allen cross outine; Review of JA testimony and proposed questions re: follow-up for JL	0.60	240.00	MPC
Apr-19-22	Review and respond to email correspondence from JL re: Telephone Conference. Continue Preparing for Evidentiary Hearing.	0.50	197.50	МАН
	Conference with JL and MAH re: ongoing trial strategy (no charge)	0.40	0.00	MPC
Apr-20-22	Prepare for and attend Telephone conference with JL and MC (no charge)	1.00	0.00	МАН
Apr-22-22	Review of trial preparation outline from JL; Drafted response to JL; Forwarded cross outlines and NRCP 52 ideas; Review of JL's NRCP 52 outline	0.80	270.00	MPC
Apr-26-22	Courtesy Discounts - MAH	0.00	-9,842.81	MAH
	Finish preparing for Evidentiary Hearing. Review and Consider NRCP 52(c) arguments.	2.00	790.00	МАН
	Review of file; Review of trial transcripts; Prepared NRCP 52 argument and argument outline	1.40	560.00	MPC
Apr-27-22	Travel to and attend Evidentiary hearing.	7.00	2,800.00	MPC
	Travelled to and attended trial in Department O	7.00	2,362.50	MPC
Apr-28-22	Finish preparing for Evidentiary Hearing. Travel to and attend Evidentiary Hearing.	6.80	2,295.00	MAH
	Travelled to and attended trial in Department O	6.80	2,295.00	MPC
Apr-30-22	Courtesy Discount Per MPC and MAH	1.00	-11,830.64	MPC
May-02-22	Final preparation of NRCP 52 argument; Review of JL's argument outline; Travelled to and appeared in Department O for NRCP 52 argument	4.20	1,417.50	MPC
May-09-22	Time Reduction Adjustment		-405.00	MPC
May-11-22	Email exchange with JL and MAH re: case status	0.20	80.00	MPC

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May-16-2	2 Drafted email to client re: sta representation	tus and status of	0.20	80.00	MPC
	Telephone conference with JI directed verdict strategy	re: status and	0.20	80.00	МРС
May-17-22	Telephone conference with cl	ient re: status	0.20	80.00	MPC
			0.80	320.00	MPC
May-23-22	Travelled to and attended hear Department O	ing in	2.20	880.00	MPC
	Telephone conference with MI strategy; Review of case histor prior orders re: Wyoming Dow Charge]	y; Review of	0.20	80.00	MPC
May-24-22	Travelled to and attended meet JL, and DW	ing with MAH,	2.60 1,	040.00	MPC
May-25-22	Review of email and schedule to	from DW 0	0.20	80.00	MPC
Jun-02-22	Conference with JL, MAH, and trial issues	Dan Garety re: 1	.80 7	720.00	MPC
Jun-07-22	Review of lengthy email from J	L re: 0	.20	80.00	MPC
Jun-28-22	Review of case file re: case strated Conference call with MAH, JL,	tegy; 1. and DW	80 7	20.00	MPC
	Review of follow-up email from	ı MAH re: 0.	20	80.00	MPC
Jun-29-22	Review of Decision and Order a	nd NOE 0.	60 24	40.00	MPC
	Follow-up telephone	0.4	40 10	50.00	MPC

conference	with	MAH	re:	Decision	and Order	

,	Review of hearing transcripts re: Management Fee testimony	2.40	960.00	МРС
Jun-30-22	Review of email from client re	0.20	80.00	MPC
	Review of file; Conference with MAH, JL, and DW re: directed verdict decision	1.20	480.00	MPC
	Review of email from JL re: Management Fee issue; Review of related exhibits	0.40	160.00	MPC
Jul-01-22		0.40	160.00	MPC
Jul-04-22	Review of email from JL re: Court findings	0.20	80.00	MPC
	Telephone conference with JL, MAH, and JW; Prepared powerpoint presentation for hearing	2.20	880.00	MPC
	Review of emails from JL and MAH re: prior testimony; Revised PowerPoint presentation; Review of JL's proposed examination; Restructured proposed examination	1.80	720.00	MPC
	Review of Trial Memorandum; Review of Motion to Amend; Follow-up email exchange with JL	0.80	320.00	MPC
	Review of file re: final trial preparation; Travelled to Court for hearing in Department O; Conference with MAH, JL, and DW re: examination; Attended hearing in Department O	3.40	1,360.00	MPC
Jul-25-22	Telephone conference with JL re: status	0.20	80.00	MPC

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Jul-27-22	Telepho	one conference	with MAH	re: status		0.20	;	80.00		MPC
	Review Recons	ed and revised ideration	Motion for			0.80	32	20.00		MPC
Jul-28-22	Review Counter	ed and revised (motion	Opposition	and	(0.60	24	0.00]	МРС
	Telepho strategy	ne conference v	vith JL re:	status and	(0.40	16	0.00	Ŋ	мрс
Aug-09-22	Review	of Status Repor	t		0	.40	160	0.00	V	льс
	Review	of OST			0	.20	80	0.00	N	ЛРС
	Reviewe	d and revised S	tatus Repo	πt	0.	.60	240	00.	N	1PC
Aug-10-22	Email ex re: OST's	change with JL	re: email f	rom Court	0.	20	80	.00	M	IPC
	Email exc and case:	change with JL strategy	re: status o	f hearing	0.5	20	80	.00	M	PC
Aug-11-22	Email exc opposing	change with JL; counsel re: hear	Drafted er ing logisti	nail to cs	0.2	20	80.	00	М	PC
Aug-12-22	Email exc	hange with JL t	e: hearing	timing	0.2	20	80.	00	M	PC
Aug-24-22	Review of settlement	email from opp discussions	osing cou	nsel re:	0.2	0	80.	00	M	PC
Aug-25-22	Review of	email from MA	AH; Drafte	d response	0.2	0	80.0)0	MI	PC
	Review of	email from JL			0.2	0	80.0)0	MI	PC
Aug-29-22	Email excl	nange with JL re	e: status; F	ollow-up	0.2	0	80.0)0	MF	° C

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	telep	hone conference with JL re: hea	ring issues		
Aug-30-22		elled to and attended hearing restaining issues	1.4	0 560.00	MPC
Dec-05-22	Emai	l exchange with JL and MAH re	0.20	0 80.00	МРС
	Drafto	ed email to law clerk re: status o	of order 0.20	00.08	MPC
Dec-06-22	Revie status	w of email response from law o of order	lerk re: 0.20	80.00	MPC
Dec-07-22	Revie memo	w of email from MAH re: attorn	ney's fees 0.20	80.00	МРС
Dec-14-22	Review inform	v of email from MAH re: Brun: ation needed	zell 0.20	80.00	МРС
Dec-19-22	Email	to MAH re: Brunzell	0.20	80.00	MPC
	Totals		509.70	\$149,939.11	
DISBURSE	MENTS				
Apr-21-21	E-Filin Attorne	g and processing Fee - Substitu	tion of	10.00	

DISBURSEM	ENTS	
Apr-21-21	E-Filing and processing Fee - Substitution of Attorney	10.00
Apr-27-21	E-Filing and processing Fee - Plaintiff's Authenticity Objection Under NRCP 16.2 and/or NRCP 16.205	10.00
Apr-30-21	E-Filing and processing Fee - Plaintiff's Authenticity Objection Under NRCP 16.2 and/or NRCP 16.205	10.00
May-04-21	Postage Expense - Invoice sent to E. Nelson	0.55
May-14-21	Photocopy Expense - 4/09 - 5/07	12.50
	Photocopy Expense - 4/09 - 5/07	0.50
May-17-21	E-Filing and processing Fee - Plaintiff's Brief Regarding Child Support et. al.	10.00
	E-Filing and processing Fee - Plaintiff's Brief Regarding Child Support and Spousal Support	10.00

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May-18-2	E-Filing and processing Fee - Plaintiff's Amended Brief Regarding Child Support et. al.	10.00
Jun-02-21	E-Filing and processing Fee - Plaintiff's Amended Brief Regarding Child Support and Spousal Support	10.00
Jun-02-21	E-Filing and processing Fee - Opposition to Defendant's Objection to Plaintiff's Proposed et. al. & Exhibit Appendix in Support of Plaintiff's Opposition to Defendant's et. al.	10.00
Jun-14-21	Photocopy Expense - 5/08 - 6/09	49.50
Jul-14-21	Photocopy Expense - 6/10 - 7/08	357.25
	Photocopy Expense - 6/10 - 7/08	
Aug-13-21	Photocopy Expense - 7/09 - 8/09	4.25
Sep-10-21	Photocopy Expense - 8/10 - 9/09	144.00
Sep-20-21	E-Filing and processing Fee - Proof of Service	6.50
-	& Proof of Service	10.00
Sep-22-21	Postage Expense - Invoice & Check #1612/\$75.00 sent to John Wilks Process Serving	0.55
Sep-30-21	Photocopy Expense - 9/10 - 9/30	70.50
Oct-12-21	Photocopy Expense - 10/01 - 10/11	0.25
Oct-28-21	Photocopy Expense - 10/12 - 10/27	75.25
Nov-04-21	E-Filing and processing Fee - Motion to	10.00
	Continue Discovery Deadline for Rebuttal	10.00
	Expert & Exhibit Appendix in Support of	
Nov-09-21	Plaintiff's Motion to Continue et.al.	
1104-09-21	Postage Expense - Invoice & Check	0.58
	#1622/\$185.00 sent to John Wilks Process	
	Serving	
	E-Filing and processing Fee - Proof of Service & Proof of Service & Proof of Service	10.00
Nov-12-21		
1107 12-21	Photocopy Expense - 10/28 - 11/10 Photocopy Expense - 10/28 - 11/10	87.25
Nov-19-21		0.75
Nov-29-21	Credit Card Expense - Office Depo Lunch	125.17
Dec-09-21	Photocopy Expense - 11/11 - 11/29	343.00
Dec-03-21 Dec-13-21	Photocopy Expense - 11/30 - 12/09	10.00
	Postage Expense - Invoice & Check #1635/\$1825.85 sent to Depo International	0.58
Dec-21-21	Postage Expense - Invoice & Check #1639/\$1,789.00 sent to Anthem Forensics	0.58
Dec-29-21	Photocopy Expense - 12/10 - 12/29	303.25
Jan-11-22	Postage Expense - Invoice & Check	0.58
	#1645/\$1345.00 sent to Depo International	0.36
	Office Supply - Thumb drives x 2	20.00
Jan-13-22	Photocopy Expense - 12/30 - 1/10	331.75
Jan-26-22	Postage Expense - Plaintiff Disclosure of	1.96
	Documents Pursuant to NRCP 16.2 sent to J.	1.70
	Luseck	

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I. or or	Postage Expense - Plaintiff Disc Documents Pursuant to NRCP 1 Karacsonyi, Esq.	losure of 1.96 6.2 sent to J.	
Jan-27-22	Photocopy Expense 1/11 - 1/27	104.00	
Feb-01-22	Photocopy Expense - 1/11 - 1/31	105.00	
	E-Filing and processing Fee - Mo Reconsider	otion to 10.00	
Feb-08-22	E-Filing and processing Fee - Ex to Reschedule February 24, 2022	Parte Motion 10.00	
Feb-11-22	Photocopy Expense - 1/28 - 2/11		
Feb-18-22	E-Filing and processing Fee - Op	232.25 position to 10.00	
16	Defendant, Lynita S. Nelson's Em Motion et.al.	nergency	
Mar-01-22	E-Filing and processing Fee - Mo Protective Order and for Attorney	tion for 10.00 's Fees and	
Mar-02-22	Costs		
Mar-04-22	Photocopy Expense - 2/12 - 2/28	194.75	
14141-04-22	E-Filing and processing Fee - Not	ice to Vacate 10.00	
	Motion for Protective Order and f Fees and Costs	or Attorney's	
Mar-11-22	Photocopy Expense - 3/01 - 3/11	207.75	
	Postage Expense - Invoice & Chec	207.75	
	#1656/\$445.00 sent to Esquire De	ck 0.58	
	Postage Expense - Invoice & Chec	ck 0.58	
	#1657/\$390.00 sent to Esquire De	po Solutions	
Mar-25-22	E-Filing and processing Fee - Plain Pre-Trial Memorandum	ntiff's 10.00	
Mar-28-22	Postage Expense - Invoice & Chec #1664/\$615.70 sent to Litigation S	k 0.58	
Mar-31-22	Postage Expense - Invoice & Chec.	•	
	#1666/\$1,147.85 sent to Litigation	k 0.58	
	Postage Expense - Invoice & Check		
	#1667/\$1,390.00 sent to Esquire D Solutions, LLC	k 0.58 eposition	
	Postage Expense -Invoice & Check	0.50	
	#1668/\$2,550.76 sent to Esquire De Solutions, LLC	0.58 eposition	
Apr-12-22	Photocopy Expense - 3/12 - 4/12	1 222 50	
Apr-25-22	Mileage Expense - Documents deli	1,332.50 vered to 19.89	
-	Family Court	19.09	
Apr-30-22	Photocopy Expense - 4/13 - 4/30	0.75	
Jun-15-22	Photocopy Expense - 5/12 - 6/14	3.00	
Jul-12-22	Photocopy Expense - 6/15 - 7/12	6.25	
Aug-12-22	Photocopy Expense - 7/13 - 8/12	12.75	
Sep-13-22	Photocopy Expense - 8/13 - 9/13	29.75	
	Totals	\$4,371.13	

	Total Fee & Disbursements for all charges on this matter	\$154,310.24
PAYMENT 1	DETAILS	
May-28-21	Payment for invoice: 22026	3,392.25
Jun-17-21	Payment for invoice: 22081	7,242.80
Jun-30-21	Payment for invoice: 22243	1,292.50
Jul-19-21	Payment for invoice: 22288	142.50
Jul-30-21	Payment for invoice: 22435	2,579.00
Aug-18-21	Payment for invoice: 22482	2,589.25
Aug-30-21	Payment for invoice: 22634	4,261.25
Sep-20-21	Payment for invoice: 22810	2,493.00
Sep-30-21	Payment for invoice: 22827	4,143.00
Oct-21-21	Payment for invoice: 22941	734.30
Nov-18-21	Payment for invoice: 23112	7,819.25
Dec-16-21	Payment for invoice: 23287	4,965.48
Dec-30-21	Payment for invoice: 23357	11,021.18
Jan-21-22	Payment for invoice: 23528	2,412.82
Feb-17-22	Payment for invoice: 23662	7,887.43
Mar-18-22	Payment for invoice: 23821	12,961.25
Apr-21-22	Payment for invoice: 24042	18,943.73
May-09-22	Payment for invoice: 24090	45,000.00
Jul-22-22	Payment for invoice: 24511	4,940.50
Aug-18-22	Payment for invoice: 24643	6,406.25
Sep-20-22	Payment for invoice: 24781	1,692.75
Oct-21-22	Payment for invoice: 24918	909.75
Jan-20-23	Payment for invoice: 25373	400.00
	Total Payments	\$154,230.24

TRUST STATEMENT

		Disbursements	Receipts
May-24-21	Received From: Eric Nelson		3,392.25
	Payment on Account		2,272.23
May-28-21	Paid To: Fine Carman Price	3,392.25	
	Payment for invoice: 22026	2,000	
Jun-09-21	Received From: Eric Nelson		5,285.55
	Payment on Account		5,205.55
	Received From: Eric Nelson		3,392.25
	Payment on Account		2,232,22
Jun-17-21	Paid To: Fine Carman Price	7,242.80	
	Payment for invoice: 22081	•	
Jun-30-21	Paid To: Fine Carman Price	1,292.50	
	Payment for invoice: 22243	·	
Jul-19-21	Paid To: Fine Carman Price	142.50	
	Payment for invoice: 22288		
Jul-28-21	Received From: Eric Nelson		2,579.00
	Payment on Account		,
Jul-30-21	Paid To: Fine Carman Price	2,579.00	
	Payment for invoice: 22435		
Aug-16 - 21	Received From: Eric Nelson		2,589.25
	Payment on Account		,
Aug-18-21	Paid To: Fine Carman Price	2,589.25	
	Payment for invoice: 22482		
Aug-27-21	Received From: Eric Nelson		4,261.25
	Payment on Account		
Aug-30-21	Paid To: Fine Carman Price	4,261.25	
	Payment for invoice: 22634		
Sep-09-21	Received From: Eric Nelson		2,568.00
	Payment on Account		
Sep-10-21	Received From: Eric Nelson		4,261.25
	Payment on Account- Replacement Check for #12007		
Sep-15-21	Received From: Eric Nelson		-4,261.25
	Accounting - Returned Check #12007		
Sep-20-21	Paid To: Fine Carman Price	2,493.00	
	Payment for invoice: 22810		
Sep-22-21	Received From: Eric Nelson		4,143.00
	Payment on Account		

Invoice #:	Settle Page 42		February 1, 2023
	Paid To: John Wilks Process Servi	ng 75.00	
	Process server - Routine Service	75100	
Sep-30-21	Paid To: Fine Carman Price	4,143.00	
	Payment for invoice: 22827	,	
Oct-04-21	Received From: Eric Nelson		734.30
	Payment on Account		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Oct-21-21	Paid To: Fine Carman Price	734.30	
	Payment for invoice: 22941		
Nov-01-21	Received From: Eric Nelson		8,004.25
	Payment on Account		3,001,22
Nov-09-21	Paid To: John Wilks Process Servir	ng 185.00	
	Process server - Routine Service		
Nov-18-21	Paid To: Fine Carman Price	7,819.25	
	Payment for invoice: 23112	.,	
Nov-19-21	Received From: Eric Nelson		1,560.00
	Payment on Account		-,
	Paid To: Anthem Forensics	1,560.00	
	Deposition fees Expert Witness	,	
Dec-01-21	Received From: Eric Nelson		6,791.33
	Payment on Account		0,77 4.22
Dec-09-21	Paid To: Depo International	1,825.85	
	Deposition fees - Transcript Reques	_	
Dec-16-21	Paid To: Fine Carman Price	4,965.48	
	Payment for invoice: 23287		
Dec-20-21	Received From: Eric Nelson		15,223.00
	Payment on Account		•
Dec-21-21	Paid To: Anthem Forensics	1,789.00	
	Deposition fees - Attendence at Depe	osition	
Dec-30-21	Paid To: Fine Carman Price	11,021.18	
	Payment for invoice: 23357		
Jan-11-22	Received From: Eric Nelson		1,345.00
	Payment on Account		
	Paid To: Depo International	1,345.00	
	Deposition fees		
Jan-21-22	Paid To: Fine Carman Price	2,412.82	
	Payment for invoice: 23528		
Feb-01-22	Received From: Eric Nelson		3,138.51
	Payment on Account		-
Feb-07-22	Received From: Eric Nelson		4,748.92
	Payment on Account		

Invoice #:	Settle	Page 43		February 1, 2023
Feb-17-22	2	Paid To: Fine Carman Price	7 007 42	

Feb-17-22	Paid To: Fine Carman Price	7,887.43	
Mar. 01. 02	Payment for invoice: 23662		
Mar-01-22	Received From: Eric Nelson		13,796.25
M 11 00	Payment on Account		
Mar-11-22	Paid To: Esquire Deposition Services, LLC.	445.00	
	Deposition fees - Cancellation		
	Paid To: Esquire Deposition Services, LLC.	390.00	
Mar-18-22	Deposition fees - Cancellation		
Mai-10-22	Paid To: Fine Carman Price	12,961.25	
Man 20 22	Payment for invoice: 23821		
Mar-28-22	Received From: Eric Nelson		24,648.04
	Payment on Account		
	Paid To: Litiation Services	615.70	
A 00 00	Document Request - Certified Transcripts		
Apr-08-22	Paid To: Litigation Services	1,147.85	
	Document Request - Cert. Transcript		
	Paid To: Esquire Deposition Services, LLC.	2,550.76	
	Deposition fees - Transcript Hard Copy		
	Paid To: Esquire Deposition Services, LLC.	1,390.00	
A 01 00	Deposition fees - Videographer		
Apr-21-22	Paid To: Fine Carman Price	18,943.73	
A== 26 22	Payment for invoice: 24042		
Apr-26-22	Received From: Eric Nelson		45,000.00
May 00 22	Payment on Account		
May-09-22	Paid To: Fine Carman Price	45,000.00	
Jul-01-22	Payment for invoice: 24090		
Jul-01-22	Received From: Eric Nelson		4,940.50
Jul-22-22	Payment on Account		
Jui-22-22	Paid To: Fine Carman Price	4,940.50	
A 12 22	Payment for invoice: 24511		
Aug-12-22	Received From: Eric Nelson		6,406.25
4 . 10.00	Payment on Account		
Aug-18-22	Paid To: Fine Carman Price	6,406.25	
A 24 22	Payment for invoice: 24643		
Aug-24-22	Received From: Eric Nelson		1,692.75
G 20.00	Payment on Account		
Sep-20-22	Paid To: Fine Carman Price	1,692.75	
0.4.02.00	Payment for invoice: 24781		
Oct-03-22	Received From: Eric Nelson		909.75
	Payment on Account		

Invoice #:	Settle	Page	44		February 1, 2023
Oct-21-22	1 434)	Co: Fine Carman Price ent for invoice: 24918		909.75	
Jan-06-23	Receiv	ved From: Eric Nelson ent on Account			400.00
Jan-20-23	Paid T	o: Carman & Price ant for invoice: 25373		400.00	
Jan-30-23	Receiv	red From: Eric Nelson nt on Account			80.00
	Total T	rust		\$167,549.40	\$167,629.40
	Trust 1	Balance			\$80.00

EXHIBIT 2

EXHIBIT 2

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DECLARATION OF COUNSEL PURSUANT TO BRUNZELL IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEY'S FEES

Michelle A. Hauser, Esq., being first duly sworn, deposes and says:

- 1. I am an attorney duly licensed to practice law in the State of Nevada and am currently practicing with the law firm of Jones & LoBello, which represents Plaintiff, Eric Nelson ("Eric") in the instant matter. Prior to joining Jones & LoBello I was an associate attorney with Fine|Carman|Price n/k/a Carman & Price. I have personal knowledge of the facts stated herein, except for those stated upon information and belief and, as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.
- 2. John Jones' rate on this case is \$500.00 per hour. My hourly rate is \$395.00.
- In determining the reasonableness of a fee, Rule.1.5, of Nevada Rules 3. of Professional Conduct dictates the following factors be considered:
- (1) The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly;
- (2) The likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer;
 - (3) The fee customarily charged in the locality for similar legal services;
 - (4) The amount involved and the results obtained;
 - (5) The time limitations imposed by the client or by the circumstances;

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- (6) The nature and length of the professional relationship with the client;
- (7) The experience, reputation, and ability of the lawyer(s) or staff performing the services; and
 - (8) Whether the fee is fixed or contingent.
- 4. Subparagraph (1): The legal issues in this case were complicated given the positions taken by the Defendant. As denoted in Eric's underlying motion, post remand, Lynita/LSN took positions which were contrary to well settled law. For example, Lynita/LSN disputed it was their burden of proof to show community assets had been commingled with ELN assets. This caused Eric to incur fees and costs to resolve this matter.
- 5. Subparagraph (2): The time required to defend against this action was considerable. Eric is only requesting the fees he has paid to Jones & LoBello and Carman & Price for preparing for the multiple motions, oppositions, replies, hearings, discovery, trial preparation, and trial he has incurred since April 2021, through the present.
- 6. Subparagraph (3): Fees charged for similar legal services, as more specifically set forth below, fall within the median range for similar services in the greater Las Vegas area.
- 7. Subparagraph (4): As set forth above, while this case should not have been so costly in a vacuum, the unreasonable positions taken by Lynita/LSN has

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caused Eric to incur unnecessary fees and cost.

- 8. Subparagraph (5): The incurred attorney's fees and costs in question have occurred since April 21, 2021, through the present.
- 9. Subparagraph (6): Jones & LoBello has represented Eric since May of 2022. Previously, Ms. Hauser was an employee of Fine|Carman|Price wherein she represented Eric along with Michael Carman, Esq.
- 10. Subparagraph (7): Mr. Jones was admitted to practice with the State Bar of Pennsylvania in 1994 and Nevada in 1998 and has practiced family law exclusively ever since. He has practiced before the State and Supreme Courts of Nevada, as well as before the United States District Court, District of Nevada. He is a graduate of the American Bar Association Family Law Section, Trial Advocacy Institute.
- 12. I was admitted to practice by the State Bar of Nevada in 2001 and have practiced complex family law exclusively since 2005. Prior to this, I practiced in the areas of criminal and civil law. I attended the American Bar Association Section of the Family Law Trial Advocacy Institution in May 2008. I am admitted to the United States District Court for the District of Nevada and the U.S. Court of Appeals for the Ninth Circuit. I am a contributing author for the Nevada Family Law Practice Manual, 2008 Edition. I have served as the Secretary, Vice-Chair, and Chair of the Nevada Family Law Section Executive Committee. I have also taught Continuing Legal Education and participated in several committees through the State Bar of

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Nevada. I have also acted as the "secretary" for the Bench Bar committee. Mr. Jones and I are both in good standing in the State of Nevada.

- Subparagraph (8): The fees in this case are fixed. 13.
- Based upon the factors listed in Brunzell v. Golden Gate Nat'l Bank, 85 14. Nev. 345, 349, 455 P.2d 31 (1969), the attorneys' fees charged and requested are reasonable, and the Court should award the same. The Brunzell factors are as follows:
- Qualities of the Advocate: Mr. Jones has practiced law in this a. State since 1994 and has a reputation for competency in litigation. He is a senior partner at Jones & LoBello. Ms. Hauser is an associate attorney and has practiced since 2001. In this case, Eric was billed for legal services at the rates agreed to with this firm. This sum is reasonable in light of the legal experience and the fees generally charged in this community.
- The rates Eric has been charged hourly rates for the firm's b. services were \$500.00 per hour for Mr. Jones and my hourly rate was \$395.00 per hour. These rates are reasonable in light of the legal experience of the law firm and the particular attorneys involved. The fees are generally on par with those charged in this community.
- Character of Work: On information and belief, the Court is aware c. of the work product of my firm, Jones & LoBello, and Fine|Carman|Price-n/k/a Carman & Price and its attorneys and staff.

9950 West Flamingo Road, Suite 100 Las Vegas, Nevada 89147 702-318-5060 FAX: 702-318-5070 14 15 16 17 18 19 20 21 22

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d. The Work Actually Performed: As set forth above, and as evidenced by the underlying motion, this matter required time, attention, commitment, dedication and knowledge. Attached to the underlying motion is an itemization of the time spent. I retrieved these billing records from Jones & LoBello's Clio billing software on or about February 17, 2023. I have reviewed the Billing Records and recognize them as including my billing entries for work I performed, as well as for work I know was performed by others regarding the instant dispute. The billing records are a true, accurate, and correct copy of Jones & LoBello's billing records—related to the instant dispute—as they are routinely made and kept in the course of the firm's business and usual practice. The billing records were made at or near the time of the event that it records by persons with knowledge, or from information transmitted by a person with knowledge, and who reported such knowledge in the regular course of business.

Attached to the underlying motion is an itemization of the time spent. Mr. Carman provided me a copy retrieved these billing records. I have reviewed the Billing Records and recognize them as including my billing entries for work I performed, as well as for work I know was performed by others regarding the instant dispute. The billing records are a true, accurate, and correct copy of Carmen & Price's billing records—related to the instant dispute—as they are routinely made and kept in the course of the firm's business and usual practice. The billing records

were made at or near the time of the event that it records by persons with knowledge, or from information transmitted by a person with knowledge, and who reported such knowledge in the regular course of business.

In view of the foregoing, the Court should award attorney's fees and 15. costs to Eric.

Dated this 21stth day of February, 2023.

/s/ Michelle A. Hauser MICHELLE A. HAUSER

CARMAN & PRICE FAMILY LAW ATTORNEYS

BRUNZELL DECLARATION OF MICHAEL P. CARMAN, ESQ.

STATE OF NEVADA)
CLARK COUNTY) ss)

I, Michael P. Carman, pursuant to EDCR 5.102, hereby declare under penalty of perjury that I am counsel for Eric Nelson in the above-entitled action and submit this declaration in support of his Motion for Attorney's Fees.

In regard to the factors set forth in <u>Brunzell v. Golden Gate National Bank</u>, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969), I believe that my hourly rate of \$400.00 is reasonable based upon my experience, and that the total amount of time billed in this case was reasonable based upon the incredibly unique circumstances of it.

I have been practicing law since 1997 and have practiced primarily in the area of family law for over twenty years (20) years. Throughout that time, I have conducted hundreds of contested hearings and / or trials in Clark County and have represented clients before the Supreme Court of Nevada. I am an A/V peer-reviewed attorney, and have received an A/V Judicial Rating as well. I have presented at various Continuing Legal Education programs, and previously served on the State Bar of Nevada's Family Law Executive Council for a full eight years. I have been honored to serve on numerous committees including the Judicial Education Requirements Study

CARMAN & PRICE FAMILY LAW ATTORNEYS

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Committee, the Eighth Judicial District Family Court Bench / Bar Committee, the Child Witness Committee, and the Eighth Judicial District Family Court Rules Committee. I have also participated in the Eighth Judicial District Settlement Master Program.

To minimize legal expenses to Eric, Ms. Hauser and Mr. Carman did not bill their individual hourly rate when they both appeared before the court and billed at a reduced co-counsel rate. We routinely delegated tasks to quality employees who have a lower billable rate, or did not charge for their services.

I am presently in good standing in the State of Nevada and the State of Colorado.

The work performed in this case was complex, extremely important, and necessary. The underlying facts of this case presented unique issues regarding the transfers of Disputed Properties between self-settled spendthrift trusts. As such, the character of the work performed was extremely important in demonstrating to the court that there was no community property within Mr. Nelson's trusts. Further, Eric is only requesting an award of attorney's fees from April 2021 forward. The majority of the fees were incurred preparing and conducting the trial.

CARMAN & PRICE FAMILY LAW ATTORNEYS

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The work performed in this case included but was not limited to:

- Preparing for and attending the trial which commenced in March 2022:
- Preparing for and conducting the deposition of Joe Leauanae and Jennifer Allen of Anthem Forensics;
- Preparing for and conducting the deposition of Lynita;
- Defending the deposition of Eric Nelson, and Douglas Winters:
- Drafting the PTM, Oppositions to Lynita's/LSN's multiple motions; and
- Attending multiple hearings.

As indicated in the Court's decision entered on June 29, 2022, and January 31, 2023, the quality of work performed by counsel was excellent, and produced a favorable outcome for Mr. Nelson. It is believed that but / for counsel's diligent work Eric would not have been the prevailing party.

Michael P. Carman, Esq.

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Electronically Filed 2/21/2023 4:36 PM Steven D. Grierson CLERK OF THE COUR

Jeffrey P. Luszeck, Esq. (#9619)

luszeck a sdfnvlaw.com

SOLOMON DWIGGINS FREER & STEADMAN, LTD.

9060 W. Cheyenne Avenue

Las Vegas, Nevada 89129

Telephone No.: (702) 853-5483 Facsimile No.: (702) 853-5485

Attorneys for Matt Klabacka, Distribution Trustee of the ERIC L. NELSON NEVADA TRUST dated May 30, 2001

DISTRICT COURT

COUNTY OF CLARK, NEVADA

ERIC L. NELSON,

Plaintiff,

VS.

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LYNITA SUE NELSON, MATT KLABACKA, as Distribution Trustee of the ERIC L. NELSON NEVADA TRUST dated May 30, 2001,

Defendants.

MATT KLABACKA, Distribution Trustee of the ERIC L. NELSON NEVADA TRUST dated May 30, 2001,

Cross-claimant,

Cross-defendant.

Vs.

LYNITA SUE NELSON,

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Case No.: D-09-411537-D Dept.: O

Oral Argument Requested?

Yes No

NOTICE: YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS MOTION WITH THE CLERK OF THE COURT AND TO PROVIDE THE UNDERSIGNED WITH A COPY OF YOUR RESPONSE WITHIN 14 DAYS OF YOUR RECEIPT OF THIS MOTION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF THE COURT WITHIN 14 DAYS OF YOUR RECEIPT OF THIS MOTION MAY RESULT IN THE

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REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT HEARING PRIOR TO THE SCHEDULED HEARING DATE.

MOTION FOR ATTORNEYS' FEES PURSUANT TO NRCP 54

Matt Klabacka, Distribution Trustee of the ERIC L. NELSON NEVADA TRUST dated May 30, 2001, hereby files his Motion for Attorneys' Fees ("Motion") wherein he requests attorneys' fees in the amount of \$539,979.80 to be borne by Lynita S. Nelson and the Lynita S. Nelson Nevada Trust dated May 30, 2001.

This Motion is based upon the papers and pleadings on file, the following Memorandum of Points and Authorities, and any oral argument at the time of the hearing of this matter.

DATED this 21st day of February, 2023.

SOLOMON DWIGGINS FREER & STEADMAN, LTD.

/s/ Jeffrey P. Luszeck

By:

Jeffrey P. Luszeck, Esq. (#9619) iluszeck@sdfnvlaw.com 9060 West Chevenne Avenue Las Vegas, Nevada 89129

Attornevs for Matt Klabacka, Distribution Trustee of the ERIC L. NELSON NEVADA TRUST dated May 30, 2001

MEMORANDUM OF POINTS AND AUTHORITIES

INTRODUCTION AND STATEMENT OF FACTS I.

Eric ("Eric") and Lynita ("Lynita") Nelson (hereinafter collectively referred to as "Nelsons") were married on September 17, 1983.

In 1993, the Nelsons entered into a valid separate property agreement (the "SPA") which transmuted their community property into each Parties' respective separate property.

The property equally divided by the SPA contemporaneously funded each Parties' 1993 separate property trust. Eric's Separate Property Trust is hereinafter referred to as "Eric's SPT," and Lynita's Separate Property Trust is hereinafter referred to as "Lynita's SPT."

In 2001, the Nelsons converted each of their respective 1993 separate property trusts into valid self-settled spendthrift trusts – respectively, the Eric L. Nelson Nevada Trust ("ELN Trust") and the Lynita S. Nelson Nevada Trust ("LSN Trust") (collectively, the "Trusts").

On May 6, 2009, Eric filed his Complaint for Divorce in the instant matter.

On June 24, 2011, Eric filed a motion seeking to join the ELN Trust as a necessary party in the instant matter.

On June 3, 2013, over five years after the original Complaint for Divorce was filed, a Decree of Divorce ("Decree") was entered after multiple trials and hearings on the matter. After the entry of the Decree, the ELN Trust filed a Notice of Appeal to the Nevada Supreme Court on October 20, 2014.

On May 25, 2017, the Nevada Supreme Court issued its Decision. As it relates to the pending issues before this Court, the Nevada Supreme Court held:

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Both the [separate property agreement] and the parties' respective SSSTs were signed, written agreements. We hold the written instruments at issue here are all valid and the terms therein are unambiguous.

We conclude the [separate property agreement] is a valid transmutation agreement, and the plain terms of the [separate property agreement] indicate it remains in effect during divorce.

We conclude the [separate property agreement] is a valid transmutation agreement and the parties' community property was converted into separate property.

[W]e conclude the [separate property agreement] was valid, and the parties' property was validly separate into their respective separate property trusts.

[W]e hold that the SSSTs are valid and the trusts were funded with separate property stemming from a valid separate property agreement.

The parties contest whether the assets within the SSSTs remained separate property or whether, because of the many transfers of property between the trusts, the assets reverted back to community property. In a divorce involving trust assets, the district court must trace those assets to determine whether any community property exists within the trusts – as discussed below, the parties' respective separate property in the SSSTs would be afforded the statutory protections against court ordered distribution, while any community property would be subject to the district court's equal distributions. We conclude the district court did not trace the assets in question.7... Without proper tracing, the district court is left with only the parties' testimony regarding the characterization of the property, which carries no weight.

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. . .

Separate property contained within the spendthrift trusts is not subject to attachment or execution, as discussed below. However, if community property exists within the trusts, the district court shall make an equal distribution of that community property.

Having concluded the district court had subject-matter jurisdiction, the written instrument at issue are valid, and the district court must trace trust assets to determine whether any community property exists within the trusts.

Based upon the Nevada Supreme Court's decision (and consistent with Sprenger v. Sprenger, 110 Nev. 855, 858, 878 P.2d 284, 286 (1994), Lake v. Bender, 18 Nev. 361, (1884); Carlson v. McCall, 70 Nev. 437 (1954); Zahringer v. Zahringer, 76 Nev. 21 (1960); Kelly v. Kelly, 86 Nev. 301 (1970); Todkill v Todkill, 88 Nev. 231 (1972); Burdick v. Pope, 90 Nev. 28 (1974); Cord v. Cord, 98 Nev. 210 (1982); Forrest v. Forrest, 99 Nev. 602 (1983); Pryor v. Pryor, 103 Nev. 148, at 150, 734 P.2d 718 (1987); and Verheyden v. Verheyden, 104 Nev. 342 (1988)) it was clear that Lynita had the burden to prove by clear and convincing evidence that separate property had been transmuted into community property. Unfortunately, this legal issue, was disputed by Lynita for at a minimum two-years post-remand.¹

It is important to note that after the Nevada Supreme Court issued its Decision,
Lynita continued for the next two years litigating the date the tracing period should
commence. Lynita's request was repeatedly denied by this Court. Even after the this
Court denied Lynita's request, Lynita filed a Petition for A Writ of Mandamus or
Prohibition with the Nevada Supreme Court on the issue of the applicable period for
tracing between the two Trusts, which was denied.

Despite it being clear that the burden of proof was on her, Lynita demanded that this Court appoint Larry Bertsch, CPA, as a Special Master to complete the tracing in its Decision entered on April 19, 2018.² Unfortunately, although Eric disputed that any transmutation occurred, he was ordered to financially assist Lynita's efforts to meet her burden that could not be met based upon the history of the Parties' trusts by paying one-half of Mr. Bertsch's fees. Although the Court later removed Mr. Bertsch on October 27, 2020 (after it became clear that he was not serving in a neutral capacity, and was not meeting the deadlines imposed by the Court), significant costs were incurred by the ELN Trust.

Based upon what appeared to be efforts by Lynita to dramatically expand the scope of the Supreme Court remand, the ELN Trust filed a Motion for Burden of Proof at Trial on May 18, 2020, to clarify the scope of the issues pending before this Court and the Parties' burdens of proof. While the Nevada Supreme Court in its Decision clearly indicated in its Decision that Lynita had the burden to show that separate

After this matter was remanded by the Nevada Supreme Court, the ELN Trust immediately requested confirmation that both Eric and Lynita would retain individual experts. Lynita however refused to retain her own expert and demanded Bertsch be appointed as a Special Matter. On August 22, 2017, Lynita argued that this Court "should re-appoint Mr. Bertsch to update the prior forensic accounting through the present date. See Lynita's Reply to Opposition to Countermotion for Final Judgment Consistent with Nevada Supreme Court's Remand, or in the Alternative, for Affirmation of Joint Preliminary Injunction, for a Receiver to Manage Property Pending Final Judgment, for Updated Financial Disclosures and Exchange of Financial Information, and for Sale of Property for Payment of Attorneys' Fees and Costs, filed with this Court on August 22, 2017, at p. 11:27-28.

property was transmuted back to community property (because the purpose of the tracing is "to determine whether any community property exists within the trusts"), and it was clear that Lynita would be required to present clear and convincing evidence that the separate property was transmuted into community property after May 30, 2001, the ELN Trust filed the motion out of an abundance of caution to ensure that there was no confusion regarding Lynita's burden of proof at trial.

On October 27, 2020, the Court issued its Decision and Order wherein it reiterated the direction provided by the Nevada Supreme Court, and held that the burden of proof by the party asserting that separate property was transmuted into community property lies with the moving party and that Lynita had the burden of proof to establish that transmutation occurred. Not happy with this decision, Lynita filed a Writ to the Nevada Supreme Court, which was denied.

Subsequent to Mr. Bertsch's removal from the case, Lynita utilized Anthem Forensics ("Anthem") and its principal Melissa Attanasio, to serve as her expert witnesses in this matter. Despite the fact that Anthem's principal – Joe Leauanae – had testified at his deposition on July 27, 2010, that "we've completed most of the forensic accounting analysis," no expert report was produced by Lynita until April 30, 2021. In reviewing Anthem's report, it quickly became clear that Anthem did not complete a tracing analysis and was unable to identify any specific assets that had been transmuted. Knowing that Lynita could not meet her burden, Anthem attempted to create artificial assumptions contrary to established case law in an attempt to put a

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proverbial square peg in a round whole in an effort to create false inferences of community property to try to cloud the record and support Lynita's flawed positions in this case. Not only did Anthem not complete a tracing analysis - because it elected to disregard information and documentation that was available - but it was learned that Lynita denied her expert access to documents that were available to her such as the Parties' joint tax returns for tax years 2001, 2002, and 2003.

Because Anthem's report failed to identify any transmutation of assets, and fell woefully short of the legal burden Lynita would need to meet, the ELN Trust filed a motion seeking summary judgment on June 21, 2021. After hearing argument on October 12, 2021, this Court issued its order indicating that Lynita had clearly not met her burden ("MSJ Order"). Although this Court did not grant summary judgment, it confirmed that Lynita bore the burden of proof and had fallen far short of meeting that burden with Anthem's report.

This Court's findings in the MSJ Order also provided Lynita with a framework regarding what Lynita was required to prove at the trial in this matter. For example, as it relates to Russell Road, this Court specifically found:

> At this time, the Court finds that one trust transferred its separate property asset to a different trust. Therefore, the evidence offered by the expert report was not clear and convincing enough to rebut this Court's presumption that the assets held by the SST's are the separate property of their respective trusts. See page 9 lines 14-21.

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Despite this Court's ruling, Lynita elected to proceed forward to trial and essentially presented the same evidence outlined in Anthem's Report that the Court already indicated would not meet her burden of proof. While it is readily apparent that Lynita ultimately failed to prove her case because it was not supported by the evidence in this case, Lynita's failure to conduct additional discovery and/or provide a supplemental expert report raises the clear inference that she deliberately chose to pursue frivolous litigation that she knew was not supported by the evidence in this case.

Rather than completing a tracing analysis, or withdrawing her claims that were not supported by the evidence in this case, Lynita elected to engage in costly litigation filing the following frivolous motions:

- October 26, 2021, Defendant, Lynita S. Nelson's, Motion to 1. Correct, Clarify, Alter or Amend, and/or Reconsider Decision on Motion for Summary Judgement Entered on October 21, 2021.
- December 21, 2021, Reply in Support of Motion to Correct, 2. Clarify, Alter or Amend, and/or Reconsider Decision on Motion for Summary Judgement Entered on October 21, 2021 and Opposition to Countermotion in Limine.
- January 7, 2022, Defendant, Lynita S. Nelson's, Status Report 3. for January 11, 2022.
- January 13, 2022, Defendant, Lynita S. Nelson's, Motion 4. Regarding Management of the Lindell Property.
- February 1, 2022, Defendant, Lynita S. Nelson's Emergency 5. Motion for an Order to Show Cause to Issue Against Eric L. Nelson and Matt Klabacka for Egregious Violation of JPI in Selling Ten Banone Properties, for Funds from Sale to be

Lynita spent the next five months engaging in incessant litigation rather than completing a tracing analysis that would have caused her to confirm that no transmutation of any community assets had occurred.

The trial commenced on March 28, 2022, with Lynita having five years post-remand to gather evidence regarding her transmutation claims. Notwithstanding, Lynita elected to proceed to trial and wholly failed to meet her legal burden. After she rested her case-in-chief, this Court issued an order on June 29, 2022, granting ELN Trust/Eric's Motion for Judgment on Partial Findings pursuant to NRCP 52(c) after hearing evidence over 8 days of testimony.³

Unfortunately, after this Court issued its order on June 29, 2022 ("June 29, 2022 Order"), Lynita/the LSN Trust continued to file frivolous motions to second-guess this Court's prior rulings. For example, and by no means of limitation, on July 4, 2022, Lynita/the LSN Trust filed a Motion to Correct, Clarify, Alter or Amend, and/or Reconsider Decision and Order entered June 29, 2022, which was denied by this Court in an Order entered on January 31, 2023. It is important to note that in the Motion to Correct, Clarify, Alter or Amend, and/or Reconsider Decision and Order entered June 29, 2022, Lynita/the LSN Trust unconscionably demanded that this Court find that tax

The June 29, 2022 Order also indicated that it required additional evidence regarding Lynita/the LSN Trust's claim that certain management fees were considered Eric's individual wages.

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returns from 2001 and 2002 be deemed community property despite the fact that this Court found that the issue "was merely mentioned during trial," and Lynita/the LSN Trust's own expert had failed to conduct any tracing investigation regarding this issue. See Decision Denying Defendant's Motion to Correct, Clarify, Alter or Amend, and/or Reconsider Decision and Order entered June 29, 2022. This is just further evidence of the absurd legal positions taken by Lynita/the LSN Trust, which unnecessarily increased the ELN Trust's attorneys' fees.

For these reasons the ELN Trust hereby requests an order awarding it \$539,979.80 in attorneys' fees against Lynita/the LSN Trust.

III. LEGAL ARGUMENT

NRCP 54(d)(2) provides in relevant part:

(2) Attorney Fees.

(A) Claim to Be by Motion.

A claim for attorney fees must be made by motion. The court may decide a postjudgment motion for attorney fees despite the existence of a pending appeal from the underlying final judgment.

(B) Timing and Contents of the Motion.

Unless a statute or a court order provides otherwise, the motion must:

- (i) be filed no later than 21 days after written notice of entry of judgment is served;
- (ii) specify the judgment and the statute, rule, or other grounds entitling the movant to the award;
- (iii) state the amount sought or provide a fair estimate of it;
- (iv) disclose, if the court so orders, the nonprivileged financial terms of any agreement about fees for the services for which the claim is made; and
- (v) be supported by:
 - (a) counsel's affidavit swearing that the fees were actually and necessarily incurred and were reasonable;
 - (b) documentation concerning the amount of fees claimed;

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(c) points and authorities addressing the appropriate factors to be considered by the court in deciding the motion.

EDCR 5.219 provides:

Sanctions may be imposed against a party, counsel, or other person, after notice and an opportunity to be heard, for unexcused intentional or negligent conduct including but not limited to:

- (a) Presenting a position that is obviously frivolous, unnecessary, or unwarranted:
- (b) Multiplying the proceedings in a case so as to increase costs unreasonably and vexatiously;
- (c) Failing to prepare for a proceeding;
- (d) Failing to appear for a proceeding;
- (e) Failing or refusing to comply with these rules; or
- (f) Failing or refusing to comply with any order or directive of the court.

A party may seek attorneys' fees when allowed by an agreement, rule, or statute.⁴ A court may additionally grant an award of attorneys' fees to a prevailing party when (a) the prevailing party's recovery is not more than \$20,000; or (b) when the court finds that the claim, cross-claim, third party complaint, or defense was brought by the opposing party without a reasonable ground or to harass the prevailing party.⁵ Further, NRS 18.010(2)(b) provides that:

The Court shall liberally construe the provisions of this paragraph in favor of awarding attorney's fees in all appropriate situations. It is the intent of the Legislature that the court award attorney's

See NRS 18.010 (governing awards of attorney fees); RTTC Communications, LLC v. The Saratoga Flier, Inc., 121 Nev. 34, 40, 110 P.3d 24, 28 (2005) (noting that "a court may not award attorney fees absent authority under a specific rule or statute").

⁵ See NRS 18.010(2)(b).

fees pursuant to this paragraph . . . in all appropriate situations to punish for and deter frivolous or vexatious claims and defenses because such claims and defenses overburden limited judicial resources, hinder the timely resolution of meritorious claims and increase the costs of engaging in business and providing professional services to the public.

he decision to award attorneys' fees is within the sound discretion

Moreover, the decision to award attorneys' fees is within the sound discretion of the district court and will not be overturned absent a "manifest abuse of discretion."

A. LYNITA/THE LSN TRUST FAILED TO RECOVER MORE THAN \$20,000.00 ON REMAND.

As indicated *supra*, on May 25, 2017, the Nevada Supreme Court issued its Decision, during which time the ELN Trust was forced to defend against Lynita/the LSN Trust's unsupported position that she possessed a community property interest in the ELN Trust. Because Lynita/the LSN Trust failed to recover more than \$20,000.00 on remand this Court should order Lynita/the LSN Trust to pay the ELN Trust's attorneys' fees in the amount of \$554,826.30, which is comprised of the attorneys' fees incurred by the ELN Trust post remand.

B. THE CLAIMS BROUGHT BY LYNITA/THE LSN TRUST ON REMAND WERE BROUGHT WITHOUT A REASONABLE GROUND.

NRS 18.010(2)(b) also allows a district court to award attorneys' fees to a party if the court finds that a claim was brought by the opposing party without a reasonable ground. Further, "[f]or purposes of NRS 18.010(2)(b), a claim is frivolous or

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⁶ Kahn v. Morse & Mowbray, 121 Nev. 464, 479, 117 P.3d 227, 238 (2005); Albios v. Horizon Communities, Inc., 122 Nev. 409, 417, 132 P.3d 1022, 1027-28 (2006).

groundless if there is no credible evidence to support it." Rodriguez v. Primadonna Co., LLC, 125 Nev. 578, 588, 216 P.3d 793, 800 (2009).

As indicated herein, the claims brought by Lynita/the LSN Trust, and the majority of positions taken by Lynita/the LSN Trust throughout the remand proceeding, were brought without a reasonable ground. For example, and by no means of limitation, the arguments/claims that Lynita/the LSN Trust brought without reasonable ground are as follows:

- That the tracing period should be 1993 June 3, 2013, as opposed to May 31, 2001 June 3, 2013;
- That Eric/the ELN Trust, as opposed to Lynita/the LSN Trust, had the burden to prove by clear and convincing evidence that separate property had been transmuted into community property; and
- That the tracing prepared by Anthem was sufficient to show that separate property had been transmuted into community property.

The ELN Trust concedes that this matter was in fact remanded back to this Court to afford Lynita/the LSN Trust the opportunity to prove her case-in-chief. That being said, it became readily apparent months prior to the 8-day trial that Lynita/the LSN Trust could not meet the stringent burden. Notwithstanding, Lynita/the LSN Trust continued to relentlessly pursue their claims without reasonable grounds, and after this Court did not rule in favor of Lynita/the LSN Trust she filed a motion for reconsideration.

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NRS 18.010(2)(b) provides that it should be liberally construed in favor of awarding attorneys' fees in appropriate situations. Here, the remand proceeding has been ongoing for over five years and Undersigned Counsel prepared for, and attended, a 8-day trial that began in March 2022, despite no reasonable ground for Lynita/the LSN Trust's claims. Lynita/the LSN Trust's behavior in this proceeding is exactly the kind which NRS 18.010(2)(b) seeks to prevent. Accordingly, the Court should award the ELN Trust's attorneys' fees pursuant to NRS 18.010(2)(b).

LYNITA/THE LSN TRUST'S CLAIMS WERE BROUGHT TO HARASS THE ELN C. TRUST.

NRS 18.010(2)(b) provides that a party may recover attorneys' fees if the court finds that a claim was brought to harass the prevailing party. A prevailing party has been clarified to include plaintiffs, counterclaimants, and defendants.⁷ In Spencer v. Klementi, 136 Nev. 325, 466 P.3d 1241, 1248 (2020), the court affirmed the district court's order granting summary judgment in favor of respondent Mary Kinion. In Spencer, the court further determined that the district court did not abuse its discretion in finding that Kinion was the prevailing party and awarding Kinion attorneys' fees based on a NRS 18.010(2)(b) determination that the malicious prosecution counterclaim brought against Kinion was brought or maintained without reasonable

Smith v. Crown Fin. Servs. of Am., 111 Nev. 277, 284, 890 P.2d 769, 773 ²⁷ (1995).

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ground or to harass the prevailing party. Similarly, here, this Court ruled in favor of the ELN Trust by finding that neither Lynita nor the LSN Trust are entitled to any of its assets.

Since remand, Lynita/the LSN Trust has lost the majority, if not all issues. Notwithstanding, at every turn, Lynita/the LSN Trust would ask this Court to reconsider its prior orders as stated herein.

Lynita/the LSN Trust knew that as long as they continued pursuing their claims, the ELN Trust would be forced to defend against them. Accordingly, the ELN Trust should be awarded attorneys' fees.

D. THE FEES SOUGHT BY ELN TRUST ARE REASONABLE AND JUSTIFIED IN AMOUNT.

In Nevada, a requesting party must demonstrate the reasonableness of attorney fees with reference to the four factors set forth in *Brunzell v. Golden Gate Nat'l Bank*, 85 Nev. 345, 455 P.2d 31 (1969). "In determining the amount of fees to award, the [district] court is not limited to one specific approach; its analysis may begin with any method rationally designed to calculate a reasonable amount, so long as the requested amount is reviewed in light of the... *Brunzell* factors."

The following four Brunzell factors are to be considered by a court:

Spencer v. Klementi, 136 Nev. 325, 466 P.3d 1241, 1248 (2020).

⁹ Haley v. Eighth Judicial Dist. Court, 128 Nev., Adv. Op. 16, 273 P.3d 855, 860 (2012); see also Gunderson v. D.R. Horton, Inc., 319 P.3d 606, 615-616, 130 Nev. Adv. Rep. 9 (2014).

- (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation;
- (3) the work actually performed by the lawyer: the skill, time and attention given to the work; and
- (4) the result: whether the attorney was successful and what benefits were derived.¹⁰

Here, it is evident that all four factors have been met.

(1) Qualities of the Advocates.

First, the quality of SDFS as an advocate is well-known within the legal market in Clark County, Nevada. SDFS maintains an AV rating by Martindale Hubbell and is recognized as a Tier One Law Firm by *US News & World Report*.

Mark A. Solomon's ("Mr. Solomon") billable hourly rate of \$685.00, is commensurate with his experience, reputation and skill in all areas of trust, estate and business litigation. Mr. Solomon practiced law for over 45 years and was the senior founding partner of SDFS. Mr. Solomon was a long-standing member of the Trust and Estate Section of the State Bar of Nevada and American Bar Association and was considered one of Nevada's premier trust and estate attorneys.

Jeffrey P. Luszeck's ("Mr. Luszeck") billable hourly rate ranging from \$400.00

^{27||10} Brunzell, 85 Nev., at 349, 455 P.3d, at 33.

in 2018 to \$490.00 in 2022, is commensurate with his experience, reputation and skill in all areas of trust, estate and business litigation. Mr. Luszeck has been a partner at SDFS for over seven years; has practiced law for over 15 years; regularly litigates business, probate, and trust cases at the trial and appellate level in both state and federal court and has received numerous honors and accolades in the Nevada legal community.¹¹

To ensure resources, and to minimize legal expenses, ¹² SDFS delegated tasks to quality employees who have a lower billable rate, namely, Craig D. Friedel ("Mr. Friedel") and Joshua M. Hood ("Mr. Hood"). Mr. Friedel has been an associate attorney at SDFS since 2015. Mr. Friedel earned his JD in or around 2015 from William S. Boyd School of Law and has practiced law for several years. ¹³ Mr. Hood was an associate attorney at SDFS from 2013 – 2022. Mr. Hood earned his JD in or around 2010 from Valparaiso University School of Law.

See Affidavit of Jeffrey P. Luszeck, Esq. in Support of Eric Nelson's Motion for Attorneys' Fees at ¶6, a true and correct copy attached hereto as Exhibit 1.

Additional tasks were also given to other attorneys at SDFS to minimize legal expenses, including, Alan D. Freer, Brian Steadman, Jacob Crawley, Roberto Campos, Steven Hollingworth, Tess Johnson, Hailey Nicklin, Marc Kustner, Matthew Kramer and Osibinaeyi Soje-Diyan.

Ex. A at $\P\P$ 7.

Similarly, Sherry Keast ("Ms. Keast") has been a paralegal at SDFS since 2005. Ms. Keast earned her Paralegal Certificate in or around 1991 and has worked in the legal field for over twenty-five (25) years.¹⁴

(2) Character of Work Performed.

Second, the character of the work performed was important and necessary. The underlying facts of this case presented an issue regarding the transfers of the properties between the LSN Trust and numerous third-parties, including the ELN Trust, and whether or not community property exists.

(3) Work Performed.

Third, the work performed in this matter included, but is not limited to:

- i. Between May 25, 2017 to present, there were over a hundred filings, of which Undersigned Counsel filed sixty (60). Said filings include, but are not limited to: (1) Writ of Mandamus; (2) numerous orders; (3) Motion for Summary Judgment; (4) Motions in Limine; and (5) oppositions to Lynita/the LSN Trust's Motions in Limine;
- ii. Preparing for and attending numerous hearings between 2018-2022;
- iii. Various consultations, emails, and telephone conferences with opposing counsel, client, and co-counsel;
- iv. Research on substantive issues;
- v. Preparing for, and taking/defending multiple depositions, including, Eric, Lynita, Anthem Forensics and Doug Winters;
- vi. Preparing for and participating in an eight (8) day trial; and
- vii. Drafting the instant Motion.¹⁵

Id. at ¶14.

Id. at ¶¶ 9 and 12.

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(4) Result.

Lastly, there can be no doubt that the quality and outcome of SDFS's representation is reflected in this Court's June 29, 2022 Order and January 31, 2023 Order. Indeed, but for Undersigned Counsel's diligent work this Court may have found that Lynita had a community property interest in the ELN Trust.

IV. CONCLUSION

Based on the foregoing, the prevailing party, the ELN Trust respectfully requests an Order issue pursuant to EDCR 5.219 and NRS 18.010(2)(b), awarding it attorneys' fees of \$539,979.80, which were reasonably incurred in this matter to be assessed against Lynita, individually, <u>and</u> the LSN Trust.

DATED this 21st day of February, 2023.

Solomon Dwiggins Freer & Steadman, Ltd.

/s/ Jeffrey P. Luszeck

By:

Jeffrey P. Luszeck, Esq. (#09619)

9060 West Cheyenne Avenue
Las Vegas, Nevada 89129

Attorneys for Matt Klabacka, Distribution Trustee of the ERIC L. NELSON NEVADA Trust dated May 30, 2001

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CERTIFICATE OF SERVICE

PURSUANT to NRCP 5(b), I HEREBY CERTIFY that on February 21, 2023,

I caused to be served a true and correct copy of the MOTION FOR ATTORNEYS'

FEES to the following in the manner set forth below:

[]	Hand Delivery
[]	U.S. Mail, Postage Prepaid
[]	Certified Mail, Receipt No.:
[]	Return Receipt Request
[<u>x</u> _]	E-Service through Odyssey eFileNV as follows:

12 Michael P. Carman, Esq. **CARMAN & PRICE** 8965 S. Pecos Road, Suite 9 14 Henderson, NV 89074 mike anyfamily law.com

Attorney for Eric L. Nelson

Michelle A. Hauser, Esq. Jones & LoBello 9950 West Flamingo Road, Suite 100 Las Vegas, Nevada 89147

hauser a joneslobello.com

Attorney for Eric L. Nelson

Robert Dickerson, Esq. Josef M. Karacsonyi, Esq. The Dickerson Karacsonyi Law Group 1645 Village Center Circle, Suite 291 Las Vegas, Nevada 89134 info a thedklaw group.com

Attorneys for Lynita Sue Nelson

/s/ Alexandra Carnival

An Employee of Solomon Dwiggins & Freer, Ltd.

EXHIBIT 1

EXHIBIT 1

DECLARATION OF JEFFREY P. LUSZECK IN SUPPORT OF MOTION FOR ATTORNEYS' FEES

I, Jeffrey P. Luszeck, Esq. state and declare as follows:

I am a partner at the law firm of Solomon Dwiggins Freer & Steadman, Ltd. ("SDFS"), Counsel of Record for the Distribution Trustee of the ELN Trust in the above-captioned matter, and have personal knowledge of the facts stated herein, except those stated on information and belief, and as to those matters, I believe them to be true.

My office has expended a total of 1,343.9 hours on this matter totaling Five Hundred and Thirty-Nine Thousand Nine Hundred and Seventy-Nine Dollars and Eighty Cents (\$539,979.80) in legal fees for the period of May 25, 2017 to February 7, 2023.¹

The fees requested herein are reasonable and justified under the following factors set forth in *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969).

- (1) the qualities of the advocate: ability, training, education, experience, professional standing and skill;
- the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation;
- (3) the work actually performed by the lawyer: the skill, time and attention given to the work;
- (4) the result: whether the attorney was successful and what benefits were derived.²

Here, it is evident that all four factors have been met by SDFS.

See Detail Fee Transaction List attached hereto as Exhibit A.
 Brunzell, 85 Nev. at 349, 455 P.3d at 33.

First, the quality of SDFS as an advocate is well-known within the legal market in Clark County, Nevada. SDFS maintains an AV rating by Martindale Hubbell and is recognized as a Tier One Law Firm by *US News & World Report*.

Mark A. Solomon's ("Mr. Solomon") billable hourly rate of \$685.00, is commensurate with his experience, reputation and skill in all areas of trust, estate and business litigation. Mr. Solomon practiced law for over 45 years and was the senior founding partner of SDFS. Mr. Solomon was a long-standing member of the Trust and Estate Sections of the State Bar of Nevada and American Bar Association and was considered one Nevada's premier trust and estate attorneys.

I have been a partner at SDFS for over seven years, and have been an active member of the State Bar of Nevada since 2005. I regularly litigate business, probate, and trust cases at the trial and appellate level in both state and federal court, and have also received numerous honors and accolades in the Nevada legal community.

To ensure resources, and to minimize legal expenses,³ SDFS delegated tasks and to quality employees who have a lower billable rate, namely, Craig D. Friedel ("Mr. Friedel") and Joshua M. Hood ("Mr. Hood"). Mr. Friedel has been an associate attorney at SDFS since 2015. Mr. Friedel earned his JD in or around 2015 from William S. Boyd School of Law and has practiced law for several years. Mr. Hood was an associate attorney at SDFS from 2013 – 2022. Mr. Hood earned his JD in or around 2010 from Valparaiso University School of Law.

Similarly, Sherry Keast ("Ms. Keast") has been a paralegal at SDFS since 2005. Ms. Keast earned her Paralegal Certificate in or around 1991 and has worked in the legal field for over twenty-five (25) years

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Additional tasks were also given to other attorneys at SDFS to minimize legal expenses, including, Alan D. Freer, Brian Steadman, Jacob Crawley, Roberto Campos, Steven Hollingworth, Tess Johnson, Hailey Nicklin, Marc Kustner, Matthew Kramer and Osibinaeyi Soje-Diyan.

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Character of Work Performed. (1)

Second, the character of the work of SDFS has performed was important and necessary. The underlying facts of this case presented an issue regarding whether Lynita had a community property interest in the ELN Trust.

Work Performed. (2)

Third, the work performed in this matter included, but is not limited to:

- Between May 25, 2017 to present, there were over a hundred filings, of i. which Undersigned Counsel filed sixty (60). Said filings include, but are not limited to: (1) Motion to Dismiss and a renewed Motion to Dismiss in 2019; (2) Writ of Mandamus; (3) numerous orders; (4) Motion for Summary Judgment; (5) Motions in Limine; and (6) Oppositions to Lynita/the LSN Trust's Motions in Limine;
- Preparing for and attending numerous hearings between 2018-2022; ii.
- Various consultations, emails, and telephone conferences with iii. opposing counsel, client, and co-counsel;
- Research on substantive issues; iv.
- Preparing for, and taking/defending multiple depositions, including, V. Eric, Lynita, Anthem Forensics and Doug Winters;
- Preparing for and participating in an eight (8) day trial; and vi.
- vii. Drafting the instant Motion.⁴

(3) Result.

Lastly, there can be no doubt that the quality and outcome of SDFS's representation is reflected in this Court's June 29, 2022 Order and January 31, 2023 Order. Indeed, but for Undersigned Counsel's diligent work this Court may have found that Lynita had a community property interest in the ELN Trust.

Id. at ¶14.

SOLOMON DWIGGINS FREER I STEADMAN

In light of the foregoing, SDFS should therefore be awarded Five Hundred and Thirty-Nine Thousand Nine Hundred and Seventy-Nine Dollars and Eighty Cents (\$539,979.80) in legal fees for the period of May 25, 2017 to February 7, 2023.

DATED this 21st day of February, 2023.

/s/ Jeffrey P. Luszeck

Jeffrey P. Luszeck

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EXHIBIT A

EXHIBIT A

Client	Trans Date	Tkpr		code/ ask Code	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.000	01 Nelson, Eric	L.						_	
2998.0001	05/25/2017	18	Α	1	375.00	1.60	600.00	Evaluate order from the Nevada Supreme Court. Telephone conference with Eric and Rhonda. Evaluate and respond to numerous correspondence.	ARCH
	05 (06 (0017	40			275.00	0.20	112 50	Evaluate and respond to numerous correspondence.	ARCH
2998.0001	05/26/2017	18		1 1	375.00 375.00	0.30 0. 6 0		Telephone conference with Eric and Dan Gerety.	ARCH
2998.0001	05/30/2017	18	А	ı	373.00	0.00	223.00	Evaluate and respond to numerous correspondence.	
2998.0001	05/31/2017	18	٨	1	375.00	2.10	787 50	Evaluate order and supreme court pleadings.	ARCH
2336.0001	03/31/2017	10		,	373.00			Strategize regarding Travel to and attend lunch with Eric and Rhonda.	
2998.0001	05/31/2017	3	۸	1	500.00	0.50	250.00	Conference with Jeffrey P. Luszeck regarding	ARCH
2990.0001	93/31/2017	_	_	'	500.00	0.50		. Dictate	
								correspondence to Bob Dickerson. Dictate petition.	
2998.0001	06/01/2017	18	Α	1	375.00	1.20	450.00	Confer with Mark A. Solomon regarding	ARCH
2350.000	,,							Begin drafting memorandum	
2998.0001	06/02/2017	18	Α	1	375.00	1.90	712.50	Begin drafting memorandum	ARCH
									_
2998.0001	06/05/2017	18	Α	1	375.00	2.50	937.50	Continue to draft memorandum	ARCH
								Confer with Mark A. Solomon regarding	
2998.0001	06/05/2017	1	Α	1	675.00	1.20	810.00	Conference with Jeffrey P. Luszeck regarding	ARCH
								. Review	
								correspondence to Josef regarding	
									45614
2998.0001	06/06/2017	18	Α	1	375.00	2.30	862.50	Evaluate and respond to correspondence from Eric.	ARCH
								Draft and supplement stipulation and orders. Draft	
								memorandum regarding	
									A D.C.L.
2998.0001	06/07/2017	18	Α	1	375.00	2.00	750.00	Continue to draft memorandum regarding	ARCH
						4.00	675.00	B. i. I. War D. I. was also many a regarding	ARCH
2998.0001	06/07/2017	1	Α	1	675.00	1.00	675.00	Review Jeffrey P. Luszeck's memo regarding	ANCH
	*****	40			275.00	0.50	107 €∩	Confer with Mark A. Solomon regarding	ARCH
2998.0001	06/09/2017	18	Α	1	375.00	0.50	107.50	Conter with Wark A. Solomon regarding	ARCH
								Draft correspondence to client regarding	
2000 0001	00/12/2017	18		1	375.00	0.30	112 50	Telephone conference with Rhonda Forsberg and	ARCH
2998.0001	06/12/2017	10	А	ı	575.00	0.50	112.50	Eric Nelson. Review Nevada Supreme Court website	
								in order to determine deadlines.	
2998.0001	06/13/2017	18	Δ	1	375.00	0.30	112.50	Telephone conference with Eric Nelson and	ARCH
2990.0001	00/13/2017	10		Į.	373.00	0.50		opposing counsel. Confer with Mark A. Solomon	
								regarding ************************************	
2998.0001	06/13/2017	1	Α	1	675.00	0.30	202.50	Review Jeffrey P. Luszeck e-mail regarding	ARCH
2550.000	00, 10, =0		•					Conference with Jeffrey P. Luszeck	
								regarding regard	
2998.0001	06/14/2017	18	Α	1	375.00	0.20	75.00	Telephone conference with Eric Nelson. Brief	ARCH
								analysis of	
2998.0001	06/15/2017	18	Α	1	375.00	0.10		Telephone conference with Eric Nelson.	ARCH
2998.0001	06/16/2017	18	Α	1	375.00	0.50	187.50	Evaluate correspondence from Rochelle.	ARCH
								Supplement correspondence to opposing counsel.	
2998.0001	06/19/2017	18	Α	1	375.00	0.20	75.00	Evaluate and respond to numerous correspondence	ARCH
								regarding	ARCH
2998.0001	06/20/2017	18	Α	1	375.00	0.80	300.00	Telephone conference with Eric. Supplement and	ARCH
								finalize correspondence to Josef. Confer with	
								Nevada Supreme Court regarding	ADCH
2998.0001	06/20/2017	1	Α	1	675.00	0.80	540.00	Review and redraft correspondence to Josef	ARCH
					275.00	0.40	150.00	regarding Telephone conference with Eric and opposing	ARCH
2998.0001	06/21/2017	18	Α	1	375.00	0.40	150.00		ANCH
								counsel. Supplement and finalize stipulation and	
								order to release supersedeas bond. Draft correspondence to opposing counsel regarding	
								correspondence to opposing counser regarding	
2000 0001	06 (00 (0047	40	٨	1	375.00	0.20	75.00	Supplement and finalize stipulation and order.	ARCH
2998.0001	06/22/2017	18	А	1	3/3.00	0.20	13.00	Confer with all counsel and Eric regarding	
2000 0001	06/22/2017	1	٨	1	675.00	0.30	202.50	Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	06/23/2017	'	^	1	0.00	0.50	202.50	25	
								AA2462	
								Thursday 07/00/202	2 10 75 444

Client	Trans Date		H Tcode/ P Task Cod	le <u>Rate</u>	to Bill	Amount		Ref#
Client ID 2998.00		L,					- I Madan	ADCH
2998.0001	06/28/2017	18	A 1	375.00	0.20	75.00	Evaluate and respond to correspondence. Work on release of bond. Correspond with clients regarding	ARCH
2998.0001	06/29/2017	18	A 1	375.00	0.20	75.00	Evaluate correspondence. Telephone conference with Eric Nelson regarding	ARCH
2998.0001	06/30/2017	18	A 1	375.00	1.80	675.00	Draft motion to enforce orders, and ex parte applications regarding	ARCH
2998.0001	07/03/2017	18	A 1	375.00	0.10	37.50	Supplement motion to enforce.	ARCH
2998.0001	07/03/2017	18 .	A 1	375.00	0.80		Supplement motion to enforce. Evaluate and respond to correspondence from Eric and Rhonda.	ARCH
2998.0001	07/03/2017	14	A 1	230.00	0.50		Conducted research regarding	ARCH
2998.0001	07/03/2017	1 .		675.00	1.00		Work on strategy for	ARCH
2998.0001	07/05/2017	18 .		375.00	0.20		Evaluate and respond to correspondence.	ARCH
2998.0001	07/05/2017	1 .		675.00	0.40		Review Supreme Court decision regarding	ARCH
2998.0001	07/06/2017	18 .		375.00	0.10		Evaluate and respond to correspondence.	ARCH
2998.0001	07/07/2017	18		375.00	0.10		Evaluate and respond to correspondence.	ARCH ARCH
2998.0001	07/12/2017	18		375.00	0.10		Supplement and finalize ex parte application for an order shortening time.	ARCH
2998.0001	07/14/2017	18 .		375.00	0.10		Evaluate Nevada Supreme Court order on remittitur.	ARCH
2998.0001	07/17/2017	18		375.00	0.20		Confer with court, and client, regarding	ARCH
2998.0001	07/19/2017	18 .		375.00	0.20		Evaluate and respond to correspondence from Eric Nelson. Telephone conference with Eric Nelson. Review Jeffrey P. Luszeck e-mail regarding	ARCH
2998.0001	07/25/2017	1 .		675.00	0.20		Review Jeffrey P. Luszeck e-mail regarding	ARCH
2998.0001	07/25/2017	1 .		675.00	0.40		Telephone conference with opposing counsel	ARCH
2998.0001	07/26/2017	18 .	A 1	375.00	0.40		regarding extension and hearing. Telephone conference with with Rhonda and Eric regarding	
2998.0001	07/27/2017	18	A 1	375.00	0.20		Evaluate correspondence from Josef.	ARCH
2998.0001	07/27/2017	4 .	A 1	175.00	1.20	210.00	Review email from Jeffrey P. Luszeck; confer with Jeffrey P. Luszeck regarding review opening brief, answer and reply for relevant arguments; draft memo regarding	ARCH
2998.0001	07/28/2017	18	A 1	375.00	0.20	75.00	Confer with Craig regarding	ARCH
2998.0001	07/28/2017	4 ,	A 1	175.00	3.00		Continue to review supreme court pleadings related to begin to conduct research regarding explore potential strategy to confer with Jeffrey P. Luszeck and Brian K. Steadman regarding review spendthrift trust for review family law statutes regarding draft memo regarding .	ARCH
2998.0001	07/28/2017	11 /		475.00	0.40		Conference with Craig D. Friedel.	ARCH
2998.0001	07/30/2017	18 /	A 1	375.00	1.00	375.00	Evaluate documents in preparation of filing reply to opposition to motion to dismiss. Begin to outline issues.	ARCH
2998.0001	07/31/2017	4 ,	A 1	175.00	1.90	332.50	review review filed Opposition and Counter Motion; begin to strategize regarding continue research; emails with Jeffrey P. Luszeck.	ARCH
2998.0001	07/31/2017	18 /	A 1	375.00	2.10	787.50	Evaluate opposition and countermotion. Draft correspondence to client and Mark A. Solomon regarding Begin drafting outline for response to same.	ARCH
							AA2463	

Client	Trans Date			Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.000	1 Nelson, Eric	c L.							
2998.0001	07/31/2017	1	Α	1	675.00	1.00	675.00	Review Lynita's opposition to motion and countermotion.	ARCH
2998.0001	08/01/2017	5	Α	1	220.00	0.20	44.00	Receipt and review e-mail from Jeffrey P. Luszeck regarding CR the same;	ARCH
2998.0001	08/01/2017	4	Α	1	175.00	1.20	210.00	advise Jeffrey P. Luszeck regarding Continue to conduct research requested by Jeffrey P. Luszeck	ARCH
2000 0004	00/01/2017	10	Λ.	1	375.00	6.30	2 362 50	regarding confer with Jeffrey P. Luszeck regarding Draft reply to opposition to motion and opposition	ARCH
2998.0001	08/01/2017	18	А	1	373.00	0.50		to counterpetition.	
2998.0001	08/01/2017	3	Α	1	500.00	0.40		Analyze decision and issues for hearing. Conference with Jeffrey P. Luszeck.	ARCH
2998.0001	08/02/2017	4	Α	1	175.00	1.90	332.50	Continue to conduct research for reply and opposition; continue to draft memo regarding confer with and email Jeffrey P. Luszeck.	ARCH
2998.0001	08/02/2017	18	Α	1	375.00	1.90	712.50	Continue to draft reply to opposition to motion and opposition to counterpetition.	ARCH
2998.0001	08/03/2017	18	Α	1	375.00	0.80	300.00	Continue to work on reply and opposition, and prepare for upcoming hearing.	ARCH
2998.0001	08/03/2017	1	Α	1	675.00	1.20	810.00	Review and redraft reply and opposition to countermotion. Telephone conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	08/04/2017	18	Α	1	375.00	0.50	187.50	Continue to work on reply and opposition, and prepare for upcoming hearing.	ARCH
2998.0001	08/07/2017	18	Α	1	375.00	1.60	600.00	Prepare for hearing	ARCH
2998.0001	08/08/2017	18		1	375.00	3.50	1,312.50	Prepare for, travel to and attend hearing.	ARCH
2998.0001	08/09/2017	18		1	375.00	0.10	37.50	Telephone conference with opposing counsel. Draft correspondence to Eric.	ARCH
2998.0001	08/23/2017	1	Α	1	675.00	1.00	675.00	Review Josef's reply regarding	ARCH
2998.0001	08/24/2017	18		1	375.00	1.20		Evaluate reply to opposition to countermotion. Begin outlining response to Telephone conference with Eric and Rhonda, and evaluate correspondence from the same.	ARCH
2998.0001	08/27/2017	18	Α	1	375.00	2.00	750.00	Draft response to reply to opposition to countermotion.	ARCH
2998.0001	08/28/2017	18	Α	1	375.00	0.90	337.50	Supplement and finalize response to reply.	ARCH
2998.0001	08/28/2017	1		1	675.00	1.00	675.00	Review and redraft reply brief. Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	10/06/2017	18	Α	1	375.00	0.30		Evaluate and respond to correspondence. Brief analysis of accounting.	ARCH
2998.0001	10/10/2017	18	Α	1	375.00	0.10	37.50	Telephone conference with client.	ARCH
2998.0001	10/16/2017	18		1	375.00	0.50	187.50	Continue to evaluate accounting. Begin drafting correspondence to Josef regarding Draft correspondence to Eric and Rhonda regarding	ARCH
2998.0001	10/17/2017	18	Α	1	375.00	0.20	75.00	Supplement and finalize correspondence. Begin drafting pro forma objection to accounting.	ARCH
2998.0001	10/27/2017	18	Α	1	375.00	0.60	225.00	Evaluate correspondence from Josef. Draft correspondence to client and Rhonda Forsberg. Telephone conference with Rhonda. Evaluate complaint.	ARCH

Trans H Tcode/ Hours

Client Date Tkpr P Task Code Rate to Bill Amount Ref #

Client ID 2998.0001 Nelson, Eric L.

								ABCII
2998.0001	11/16/2017	18 A	1	375.00	0.50	187.50	Confer with Tess Johnson regarding	ARCH
							Evaluate research regarding Evaluate correspondence from Eric regarding Telephone conference with Eric Nelson.	
2998.0001	11/20/2017	18 A	1	375.00	0.20	75.00	Draft correspondence to opposing counsel.	ARCH
2998.0001	11/21/2017	18 A	1	375.00	2.50	937.50	Draft response to accounting and motion to compel production of back-up documentation.	ARCH
2998.0001	11/27/2017	4 A	1	175.00	0.10	17.50	Review email from Jeff regarding	ARCH

2998.0001 12/07/2017 4 A 1 175.00 0.80 140.00 Continu

140.00 Continue to Draft Petition; research confer with Jeffrey P. Luszeck regarding Cabin.

AA2465

ARCH

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Detail Fee Transaction File List Solomon Dwiggins Freer & Steadman, Ltd.

H Tcode/ Tkpr P Task Code Hours Trans Ref# to Bill Amount Rate Client Date Client ID 2998.0001 Nelson, Eric L.

2998.0001	12/15/2017	18 A	1	375.00 675.00	0.10 0.80		Confer with opposing counsel regarding	ARCH ARCH
2998.0001	12/26/2017	1 A	1	675.00	0.80	540.00	Review Esty regarding	7.11.0.1
2998.0001 2998.0001	01/02/2018 01/03/2018	18 A 18 A	1	400.00 400.00	0.20 2.60	80.00 1,040.00	Prepare for hearing. Prepare for, travel to and attend hearing on petition to compel production of back-up documentation.	ARCH ARCH
2998.0001	01/10/2018	18 A	1	400.00	0.90	360.00	Telephone conference with opposing counsel. Evaluate stipulation and order. Confer with Mark A. Solomon and Rhonda Forsberg regarding	ARCH
2998.0001	01/11/2018	18 A	1	400.00	0.30	120.00	Evaluate and respond to numerous correspondence from Eric.	ARCH
2998.0001	01/17/2018	18 A	1	400.00	0.10	40.00	Evaluate correspondence.	ARCH
2998.0001	01/18/2018	18 A	1	400.00	0.10	40.00	Evaluate correspondence.	ARCH
2998.0001	01/29/2018	18 A	1	400.00	0.60	240.00	Prepare for upcoming hearing.	ARCH
2998.0001	01/30/2018	18 A	1	400.00	0.40	160.00	Telephone conferences with Eric Nelson and Rhonda Forsberg. Evaluate correspondence from Eric Nelson.	ARCH
2998.0001	01/31/2018	1 A	1	685.00	0.20		Telephone conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	01/31/2018	18 A	1	400.00	3.80		Prepare for, travel to and attend hearing. Confer with Mark A. Solomon regarding	ARCH
2998.0001	02/14/2018	18 A	1	400.00	0.10		Draft correspondence to Eric regarding	ARCH
2998.0001	02/22/2018	18 A	1	400.00	0.60		Draft correspondence to opposing counsel regarding	ARCH
2998.0001	03/12/2018	18 A	1	400.00	2.20		Draft motion to compel and hold Lynita in contempt.	ARCH
2998.0001	03/14/2018	18 A	1	400.00	0.50	200.00	Supplement motion to hold Lynita in contempt.	ARCH
2998.0001	03/16/2018	18 A	1	400.00	0.40		Supplement and finalize motion to hold Lynita in contempt.	ARCH
2998.0001	04/02/2018	18 A	1	400.00	0.10		Evaluate and respond to correspondence from Eric.	ARCH ARCH
2998.0001 2998.0001	04/03/2018 04/11/2018	18 A 18 A	1 1	400.00 400.00	0.10 0.80	40.00 320.00	Evaluate correspondence from client. Substantive telephone conferences with opposing	ARCH
							counsel, Rhonda Forsberg and Eric Nelson regarding	ADCU
2998.0001	04/13/2018	18 A	1	400.00	0.20		Evaluate correspondence from Eric. Brief analysis of Lynita's opposition.	ARCH
2998.0001	04/19/2018	18 A	1	400.00	0.50		Evaluate decision. Telephone conference with Eric and Rhonda Forsberg regarding	ARCH ARCH
2998.0001	04/20/2018	18 A	1	400.00	0.50	200.00	Numerous communications with opposing counsel, Rhonda Forsberg and Eric regarding	ARCH
2998.0001	04/20/2018	1 A	1	685.00	0.50	342.50	Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	04/23/2018	18 A	1	400.00	1.10	440.00	Confer with opposing counsel, client and Rhonda ${\bf AA2466}$	ARCH
TC .							Thursday 02/09/202	23 10:35 am

Client	Trans Date	Tkpr	H Tcode/ P Task Cod	e Rate	Hours to Bill	Amount		Ref #
Client ID 2998.000)1 Nelson, Eric	: L,					Forsberg and court regarding	
							Draft stipulation and order to vacate hearing.	ADCII
2998.0001	04/24/2018	18	A 1	400.00	0.20	80.00	Supplement stipulation and order to vacate hearing. Confer with opposing counsel regarding	ARCH
2998.0001	05/02/2018	1	A 1	685.00	0.80	548.00	Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	05/04/2018	18	A 1	400.00	0.20	80.00	Brief analysis of	ARCH
2998.0001	05/04/2018	1	A 1	685.00	1.00	685.00	Review motion to reconsider. Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	05/09/2018	18	A 1	400.00	0.20	80.00	Continue to evaluate motion for reconsideration.	ARCH
2998.0001	05/15/2018	18		400.00	2.00	800.00	Begin drafting opposition to motion for reconsideration. Numerous telephone conferences	ARCH
2998.0001	05/16/2018	18	A 1	400.00	0.80	320.00	with court, Rhonda and Eric regarding Numerous telephone conferences with Rhonda, Eric and the Court regarding	ARCH
2998.0001	05/18/2018	18	A 1	400.00	0.10		Telephone conference with court regarding	ARCH
2998.0001	05/21/2018	18	A 1	400.00	2.70	1,080.00	Telephone conference with Mark A. Solomon, client and Rhonda regarding Continue to draft opposition to the	ARCH
2998.0001	05/22/2018	18	A 1	400.00	1.00	400.00	same. Finalize the same. Evaluate order affirming tracing. Confer with Eric, Rhonda and Mark A. Solomon regarding Evaluate and respond to correspondence from	ARCH
							opposing counsel. Brief analysis of Confer with Eric regarding	
2998.0001	05/22/2018	1	A 1	685.00	0.30		Review order from Sullivan regarding	ARCH
2998.0001	05/23/2018	1	A 1	685.00	0.50		Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	06/12/2018	18	A 1	400.00	2.80		Draft opposition to motion for reconsideration. Draft legal research for	ARCH
2998.0001	06/13/2018	18	A 1	400.00	1.00	400.00	Continue to work on opposition to motion for reconsideration. Evaluate and respond to numerous correspondence from Eric regarding	ARCH
2998.0001	06/19/2018	18	A 1	400.00	0.50		Supplement opposition to motion for reconsideration. Confer with Eric regarding	ARCH
2998.0001	06/20/2018	18	A 1	400.00	0.40	160.00	Evaluate and respond to correspondence from Eric regarding . Evaluate motion filed by Lynita regarding	ARCH
							by Lynna regarding	
2998.0001	06/21/2018	18	A 1	400.00	0.40		Evaluate Lynita's motion to allow her to continue manage Lindell.	ARCH
2998.0001	07/05/2018	18	A 1	400.00	0.50	200.00	Evaluate and respond to numerous correspondence regarding Telephone conference with	ARCH
2998.0001	07/06/2018	18	A 1	400.00	1.70	680.00	Rhonda and Eric regarding Evaluate and respond to correspondence regarding	ARCH
							. Begin drafting opposition to same.	
2998,0001	07/09/2018	18	A 1	400.00	1.70	680.00	Meeting with Eric. Supplement and finalize opposition to motion for reconsideration. Evaluate	ARCH
2998.0001	07/13/2018	18	A 1	400.00	0.50	200.00	correspondence from court regarding Evaluate reply to opposition to motion for reconsideration.	ARCH
2998.0001	07/18/2018	18	A 1	400.00	0.20	80.00	Brief analysis of reply to motion to allow LSN to continue to manage Lindell, and begin drafting reply	ARCH
2998.0001	07/19/2018	18	A 1	400.00	0.90	360.00	to opposition to counterpetition. Substantive telephone conference with client and Rhonda Forsberg regarding	ARCH
2998.0001	07/19/2018	1	A 1	685.00	0.50	342.50	Prepare for upcoming hearing. Conference with Jeffrey P. Luszeck regarding	ARCH
							AA2467	

Detail Fee Transaction File List

Solomon Dwiggins	Freer	&	Steadman,	Ltd.
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Client	Trans Date		Tcode/ Task Code	Rate	Hours to Bill			Ref #
Client ID 2998.000 2998.0001	1 Nelson, Eric 07/23/2018	18 A	. 1	400.00	4.50	1,800.00	Prepare for, travel to and attend hearing. Confer with Mark A. Solomon regarding	ARCH
2998.0001	07/23/2018	1 A	. 1	685.00	0.40	274.00	Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	08/01/2018	18 🗚	1	400.00	0.60	240.00	Evaluate and respond to correspondence from opposing counsel regarding property expenses and demand to record quitclaim deeds previously executed by Lynita Nelson. Telephone conference with Eric Nelson regarding Evaluate quitclaim deeds and briefly review Confer with Sherry J. Keast regarding	ARCH
2998.0001	08/01/2018	5 A	1	220.00	0.80	176.00	Confer with Jeffrey P. Luszeck; review Court Decision with respect to real property issues; e-mail to County Recorder's Audit Team regarding Real Property Transfer Tax exemptions; receipt of response from Carlos Goodin regarding; telephone conference with Mr. Goodin; advise Jeffrey P. Luszeck accordingly.	ARCH
2998.0001	08/03/2018	5 A	. 1	220.00	1.70	374.00	Draft and review Stipulation and Order relating to real property transfers; submit the same to Jeffrey P. Luszeck for consideration.	ARCH
2998.0001	08/04/2018	18 A	1	400.00	0.60	240.00	Supplement stipulation and order transferring Banone LLC and Lindell properties in order to avoid transfer tax. Confer with Sherry J. Keast regarding	ARCH
2998.0001	08/06/2018	5 A	1	220.00	0.80	176.00	Confer with Jeffrey P. Luszeck; revise Stipulation and Order; e-mail to Carlos Goodin at the Clark County Recorder's office relating thereto.	ARCH
2998.0001	08/06/2018	18 A	1	400.00	0.40	160.00	Telephone conference with Eric Nelson regarding Confer with Mark A. Solomon regarding Evaluate NRS 375.090 regarding transfer exemptions and confer with Sherry J. Keast regarding	ARCH
2998.0001	08/07/2018	5 A	1	220.00	0.10	22.00	E-mail to Carlos Goodin relating to Stipulation to transfer property.	ARCH
2998.0001	08/07/2018	18 <i>A</i>	1	400.00	0.50	200.00	Telephone conference with Clark County Recorder's office. Evaluate and respond to numerous correspondence regarding. Telephone conference with Eric Nelson regarding	ARCH
2998.0001	08/10/2018	18 A	1	400.00	0.10	40.00	Telephone conference with Clark County Recorder's office. Draft correspondence to opposing Counsel.	ARCH
2998.0001	08/14/2018	18 <i>A</i>	1	400.00	0.20	80.00	Evaluate correspondence from Clark County recorders office. Conference with Sherry J. Keast regarding	ARCH
2998.0001	08/16/2018	5 A	1	220.00	0.80	176.00	Confer with Jeffrey P. Luszeck; revise Stipulation and Order; e-mail to Carlos Goodin of the Clark County Recorder's office relating receipt and review of responsive e-mail.	ARCH
2998.0001	08/16/2018	18 <i>A</i>	1	400.00	0.20	80.00	Telephone conference with opposing counsel. Evaluate and respond to numerous correspondence from recorders office and opposing counsel regarding	ARCH
2998.0001	08/22/2018	18 <i>A</i>	A 1	400.00	0.40		Telephone conference with opposing counsel regarding . Evaluate and respond to numerous correspondence from same. Supplement stipulation and order. Confer with Mark A. Solomon regarding	ARCH
2998.0001	08/22/2018	1 A	1	685.00	0.50		Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	08/23/2018	18 A	1	400.00	0.30	120.00	Telephone conference with Rhonda Forsberg. Draft correspondence to court. Supplement and finalize AA2468	ARCH

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Client	Trans Date		Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.000	01 Nelson, Eric	: L.						
2998.0001	08/24/2018	18 /	A 1	400.00	0.10	40.00	stipulation and order. Evaluate and respond to correspondence from client	ARCH
2998.0001	08/28/2018	18 /	A 1	400.00	0.20	80.00	and court. Evaluate and respond to correspondence from court. Supplement and finalize notice of entry of order.	ARCH
							Evaluate and respond to correspondence from client.	
2998.0001	09/04/2018	1 /	A 1	685.00	0.50	342.50	Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	09/07/2018	18 /		400.00	0.10		Evaluate correspondence from opposing counsel	ARCH
2330.0001	03,01,2010	,,					and forward same to client. Evaluate Notice of Claims.	
2998.0001	09/10/2018	18 /	A 1	400.00	0.20		Evaluate and respond to numerous correspondence from Eric.	ARCH
2998.0001	09/11/2018	18 /	A 1	400.00	0.10		Telephone conference with client.	ARCH
2998.0001	09/12/2018	18 /	A 1	400.00	0.10		Telephone conference with Eric Nelson.	ARCH
2998.0001	09/13/2018	18 /	A 1	400.00	0.20		Telephone conference with Eric Nelson.	ARCH
2998.0001	09/17/2018	18 /	A 1	400.00	0.10		Evaluate and respond to correspondence.	ARCH
2998.0001	09/21/2018	18 /	A 1	400.00	0.20	80.00	Evaluate correspondence from Josef with attachments regarding Evaluate and respond to correspondence from Eric regarding	ARCH
2998.0001	09/24/2018	18 /	A 1	400.00	0.20	80.00	Evaluate and respond to correspondence from Eric Nelson and opposing counsel.	ARCH
2998.0001	09/25/2018	18 /	A 1	400.00	0.30	120.00	Evaluate numerous correspondence from Eric Nelson Draft correspondence to Josef regarding	ARCH
2998.0001	10/08/2018	18 /	A 1	400.00	0.10		Evaluate and respond to correspondence from client. Telephone conference with Larry Bertsch.	ARCH
2998.0001	10/09/2018	18 /	A 1	400.00	0.10		Telephone conference with Eric Nelson.	ARCH
2998.0001	10/10/2018	18 /	A 1	400.00	0.80		Prepare for and participate in meeting with client.	ARCH
2998.0001	10/16/2018	18 /	A 1	400.00	0.90	360.00	Evaluate notice of decision. Draft correspondence to Eric regarding Evaluate Brian Head expenses in preparation of drafting motion relating	ARCH
2998.0001	10/16/2018	1 /	A 1	685.00	0.70		Review Jeffrey P. Luszeck e-mail regarding Review Eric's e-mail regarding	ARCH
2998.0001	10/17/2018	18 /	A 1	400.00	2.30	920.00	Draft status report and petition for purchase of Brian Head cabin. Evaluate and draft correspondence to Eric and Rochelle.	ARCH
2998.0001	10/24/2018	18 /	A 1	400.00	0.80		Supplement and finalize status report and request to purchase cabin. Draft ex parte application regarding	ARCH
2998.0001	10/25/2018	18 /	A 1	400.00	0.10		Supplement and finalize ex parte application.	ARCH
2998.0001	10/30/2018	5 /	A 1	220.00	0.50		Receipt and processing of Petition for Writ of Mandamus or Other Extraordinary Relief and Petitioner, Lynita Sue Nelson's, Supplemental Appendix of Exhibits to Petition for Writ of Mandamus, Volumes 1-3; review Jeffrey P. Luszeck e-mail relating thereto; e-mail to Mr. Nelson and Mr. Klabacka; advise Jeffrey P. Luszeck regarding	ARCH
2998.0001	10/30/2018	6 /	A 1	90.00	0.40	36.00	Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	10/30/2018	1 /	A 1	685.00	1.00		Review Jeffrey P. Luszeck e-mail regarding Review writ.	ARCH
2998.0001	10/30/2018	18 /		400.00	0.80		Evaluate and respond to numerous correspondence regarding . Confer with Mark A. Solomon regarding . Confer with Jake regarding research regarding	ARCH
2998.0001	10/31/2018	18		400.00	0.80		Evaluate petition for writ.	ARCH
2998.0001	11/01/2018	18 /		400.00	0.20		Evaluate and respond to correspondence. Telephone conference with Eric Nelson.	ARCH
2998.0001	11/01/2018	1 /		685.00	1.50		Review petition for writ of mandamus. Review notice of hearing from Court.	ARCH
2998.0001	11/02/2018	18 /	A 1	400.00	0.10	40.00	Evaluate and respond to numerous correspondence. AA2469	ARCH

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Client	Trans Date	Tkpr	H Tcod	•	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.00		- <u></u>							
2998.0001	11/05/2018	6	А	1	90.00	4.50	405.00	Review Petition for Writ of Mandamus and Other Extraordinary Relief. Review Nevada Supreme Court Opinion. Legal research regarding Begin drafting memorandum of same.	ARCH
2998.0001	11/05/2018	18	Α	1	400.00	0.30	120.00	Evaluate and respond to correspondence from court. Numerous conferences with Jake regarding	ARCH
2998.0001	11/06/2018	6	А	1	90.00	5.50	495.00	Legal research regarding . Draft memorandum of same.	ARCH
2998.0001	11/06/2018	18	A	1	400.00	0.30	120.00	Evaluate and respond to numerous correspondence from court and opposing counsel regarding Confer with Jake regarding	ARCH
2998.0001	11/07/2018	6	A	1	90.00	1.40	126.00	Review 2013 divorce decree to include in memorandum regarding . Draft memorandum regarding	ARCH
2998.0001	11/07/2018	18	Α	1	400.00	0.50	200.00	Evaluate notice of appeal and related documents. Telephone conference with Eric Nelson regarding Draft correspondence to Eric regarding	ARCH
2998.0001	11/07/2018	1	Α	1	685.00	0.40		Review notice of appeal. Review Jeffrey P. Luszeck e-mail to Eric regarding	ARCH
2998.0001	11/08/2018	6	Α	1	90.00	1.30	117.00	Conference with Jeffrey P. Luszeck regarding Legal research regarding Draft memorandum of same. Legal research regarding	ARCH
2998.0001	11/09/2018	6	А	1	90.00	0.30	27.00	Complete draft memorandum regarding	ARCH
2998,0001	11/16/2018	18	Δ	1	400.00	0.20	80.00	Telephone conference with Rhonda Forsberg.	ARCH
2998.0001	11/19/2018	18		1	400.00	0.60	240.00	Prepare for and attend conference with Eric Nelson.	ARCH
2998.0001	11/20/2018	18		1	400.00	0.30	120.00	Brief analysis of Lynita's opposition and countermotion.	ARCH
2998.0001	11/24/2018	18	А	1	400.00	1.30	520.00	Begin drafting reply to response to status report. Draft correspondence to Eric and Rhonda regarding	ARCH
2998.0001	11/25/2018	18	Α	1	400.00	0.20		Evaluate and respond to correspondence from Eric. Supplement Reply.	ARCH
2998.0001	11/26/2018	18		1	400.00	0.40		Begin to prepare for hearing.	ARCH
2998.0001	11/27/2018	18	4	1	400.00	2.60		Prepare for, travel to and attend hearing.	ARCH
2998.0001	12/18/2018	5	А	1	220.00	0.10	22.00	Review e-mail from Jeffrey P. Luszeck; process Appellant's Docketing Statement; e-mail to Client and Rhonda Forsberg regarding	ARCH
2998.0001	12/18/2018	18	Α	1	400.00	0.20		Evaluate docketing statement. Telephone conference with Eric regarding	ARCH
2998.0001	12/31/2018	18	Α	1	400.00	0.10		Evaluate supreme court filing.	ARCH
2998.0001	01/15/2019	18	Α	1	425.00	0.20		Evaluate motion for reconsideration.	ARCH
2998.0001	01/21/2019	1		1	685.00	0.50		Review file regarding	ARCH
2998.0001	01/22/2019	18		1	425.00	0.20		Evaluate and respond to correspondence. Conduct legal research regarding	ARCH ARCH
2998.0001	01/23/2019	18	А	1	425.00	0.20			
2998.0001	01/28/2019	18	Α	1	425.00	0.70		Meeting with Eric Nelson. Evaluate and respond to correspondence from Judge Sullivan's law clerk regarding	ARCH
2998.0001	01/30/2019	18	Α	1	425.00	0.10		Draft correspondence to Larry Bertsch.	ARCH
2998.0001	02/01/2019	18	Α	1	425.00	0.40	170.00	Evaluate Supreme Court order. Draft correspondence to Eric Nelson regarding	ARCH
2998.0001	02/04/2019	18	Α	1	425.00	0.20		Telephone conference with Larry Bertsch.	ARCH
2998.0001	02/05/2019	18		1	425.00	0.30	127.50	Telephone conference with Larry Bertsch. Evaluate	ARCH
								numerous Lis Pendens. AA2470	
								Thursday 02/09/202	12 10.35 am

						33			
Client	Trans Date	<u> </u>		Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 2998.00 2998.0001	01 Nelson, Eri 02/06/2019	ic L. 18	Α	1	425.00	0.20	85.00	Telephone conference with Larry Bertsch. Draft correspondence to Court.	ARCH
2000 0004	02 (27 /2010	10	٨	4	425.00	0.20	85.00	Telephone conference with Larry Bertsch.	ARCH
2998.0001 2998.0001	02/07/2019 02/08/2019	18 18		1 1	425.00	0.80		Telephone conference with Larry Bertsch. Evaluate correspondence from same, including attachments. Draft correspondence to Eric Nelson regarding	ARCH
2998.0001	03/01/2019	18	Α	1	425.00	0.20	85.00	Draft correspondence to Larry Bertsch. Evaluate notice in lieu of remittur.	ARCH
2998.0001	03/07/2019	18	Α	1	425.00	0.20	85.00	Evaluate and respond to correspondence from client. Telephone conference with same.	ARCH
2998.0001	03/08/2019	18	Α	1	425.00	0.10	42.50	Begin preparation for upcoming hearing.	ARCH
2998.0001	03/11/2019	18	A	1	425.00	2.40	1,020.00	Telephone conference with Eric and Dan Gerety regarding Confer with Mark A. Solomon regarding	ARCH
2998.0001	03/11/2019	1	Α	1	685.00	1.00	685.00	Review Motion for Special Matter. Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	03/12/2019	18	Α	1	425.00	3.40	1,445.00	Prepare for, travel to and attend status check hearing. Telephone conference with Eric and opposing counsel.	ARCH
2998.0001	03/12/2019	1	Α	1	685.00	0.40	274.00	Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	03/13/2019	18	Α	1	425.00	2.50	1,062.50	Telephone conference with Eric and Rhonda. Evaluate correspondence from Larry Bertsch. Draft settlement offer. Confer with Eric regarding	ARCH
2998.0001	03/14/2019	18	Α	1	425.00	0.10	42.50	Evaluate and respond to correspondence.	ARCH
2998.0001	03/18/2019	18		1	425.00	1.90	807.50	Continue to draft settlement offer. Evaluate transcript from prior hearing in order to revise proposed order.	ARCH
2998.0001	03/18/2019	1	Α	1	685.00	0.50	342.50	Review draft settlement letter from Jeffrey P. Luszeck to Josef.	ARCH
2998.0001	03/19/2019	18	Δ	1	425.00	0.10	42.50	Evaluate and respond to correspondence.	ARCH
2998.0001	03/20/2019	18		1	425.00	1.20		Telephone conference with Rhonda and Josef.	ARCH
	,,							Supplement order.	
2998.0001	03/22/2019	18	Α	1	425.00	0.60	255.00	Telephone conference with Eric. Supplement order from November 27 hearing. Confer with Eric regarding	ARCH
2998.0001	03/25/2019	18	Α	1	425.00	0.10	42.50	Evaluate and respond to numerous correspondence regarding order modifications.	ARCH
2998.0001	03/26/2019	18	Α	1	425.00	0.60	255.00	Supplement order. Draft correspondence to Josef regarding Evaluate Supreme Court granting telephonic extension. Confer with with Josef regarding	ARCH
2998.0001	03/29/2019	23	Α	1	75.00	1.90	142.50	Legal research for Jeffrey P. Luszeck regarding	ARCH
2998.0001	04/02/2019	23	Α	1	75.00	1.60	120.00	Legal research for Jeffrey P. Luszeck regarding	ARCH
2000 0001	04/04/2019	18	Δ	1	425.00	0.10	42 50	Telephone conference with Rhonda Forsberg.	ARCH
2998.0001 2998.0001	04/04/2019	23		1	75.00	0.80	60.00	Legal Research for Jeffrey P. Luszeck regarding	ARCH
2330.0001	U-7/U-7/EU 13	رے	77	,	. 5.00	2.00			
2998.0001	04/05/2019	23	Α	1	75.00	5.50	412.50	Legal Research and summary for Jeffrey P. Luszeck regarding	ARCH
2998.0001	04/08/2019	18	Α	1	425.00	0.10	42.50	Evaluate and respond to correspondence.	ARCH
2998.0001	04/11/2019	18		1	425.00	0.20	85.00	Evaluate and respond to numerous correspondence.	ARCH
2998.0001	04/11/2019	1	Α	1	685.00	1.00		Review Lynita's opening appeal brief.	ARCH
2998.0001	04/12/2019	18	Α	1	425.00	0.10	42.50	Evaluate and respond to correspondence from Eric Nelson.	ARCH
								AA2471	12.10-25

Client	Date	Tkpr		Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.00	01 Nelson, Eri	c L.	_						
2998.0001	04/22/2019	18	Α	1	425.00	0.10		Evaluate and respond to numerous correspondence. Confer with Mark A. Solomon regarding	ARCH
2998.0001	04/23/2019	18	Α	1	425.00	0.50	212.50	Numerous telephone conferences with Rhonda Forsberg. Telephone conference with opposing counsel.	ARCH
2998.0001	04/26/2019	18	Α	1	425.00	0.30	127.50	Telephone conference with Rhonda Forsberg. Draft correspondence to court.	ARCH
2998.0001	04/30/2019	18	Α	1	425.00	0.50	212.50	Evaluate appellate brief. Evaluate substitution of council.	ARCH
2998.0001	05/01/2019	18	Α	1	425.00	0.20	85.00	Evaluate and respond to correspondence from Dawn Throne.	ARCH
2998.0001	05/01/2019	1	Α	1	685.00	0.50	342.50	Conference with k[; regarding	
2998.0001	05/04/2019	18	Α	1	425.00	0.10	42.50	Evaluate and respond to correspondence from client.	ARCH
2998.0001	05/08/2019	18	Α	1	425.00	1.10	467.50	Telephone conference with Eric Nelson and Dawn Throne. Begin outlining answering brief.	ARCH
2998.0001	05/09/2019	_	Α	1	220.00	0.10	22.00	Confer with Jeffrey P. Luszeck.	ARCH
		18		1	425.00	0.70		Continue to outline answering brief.	ARCH
2998.0001	05/09/2019						110.00	Review Jeffrey P. Luszeck e-mail; review initial filings	ARCH
2998.0001	05/10/2019	5	А	1	220.00	0.50		regarding accordingly.	
2998.0001	05/10/2019	18	Α	1	425.00	0.10	42.50	Evaluate order.	ARCH
2998.0001	05/16/2019	18	Α	1	425.00	0.10	42.50	Evaluate and respond to correspondence.	ARCH
2998.0001	05/17/2019	18	Α	1	425.00	0.40	170.00	Evaluate and respond to numerous correspondence.	ARCH
	00, 11, 2111	•						Telephone conference with opposing counsel. Supplement and finalize stipulation and order.	
2998.0001	05/20/2019	18	Α	1	425.00	0.20	85.00	Evaluate and respond to correspondence from Josef and Dawn Throne. Supplement stipulation and order to extend pleading deadline.	ARCH
2998.0001	05/20/2019	3	Α	1	550.00	0.30	165.00	Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	05/23/2019	18	٨	1	425.00	2.80	1 190 00	Continue to work on answering brief.	ARCH
						0.10		Telephone conference with Supreme Court.	ARCH
2998.0001	05/24/2019	18	А	1	425.00	0.10	42.50		Ancii
								Evaluate and respond to other correspondence.	ABCII
2998.0001	05/27/2019	18		1	425.00	0.50		Begin outlining hearing transcripts for use in answering briefs and potential motion to dismiss.	ARCH ARCH
2998.0001	05/28/2019	18	Α	1	425.00	1.70	722.50	Work on answering brief. Prepare for and participate in telephone conference with Dawn Throne.	AKCH
2998.0001	05/29/2019	18	Α	1	425.00	0.70	297.50	Confer with Mark A. Solomon regarding	ARCH
2998.0001	05/29/2019	1	Α	1	685.00	0.60	411.00	same. Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	05/30/2019	18	Α	1	425.00	4.60	1,955.00	Conduct legal research for inclusion in motion to dismiss appeal. Draft motion to dismiss appeal.	ARCH
								Confer with Alan D. Freer regarding	
2998.0001	05/30/2019	1	Α	1	685.00	0.80	548.00	Analyze and outline argument for motion to dismiss and conference with Jeffrey P. Luszeck.	ARCH
2998.0001	05/31/2019	18	Α	1	425.00	1.40	595.00	Evaluate declaration of renewal of judgment. Draft correspondence to Dawn and Eric regarding Confer with Mark A. Solomon regarding Supplement motion to dismiss	ARCH
2998.0001	05/31/2019	1	Α	1	685.00	0.50	342.50	appeal. Review and redraft Motion to Dismiss; legal research	ARCH
							_	regarding	4000
2998.0001 2998.0001	06/01/2019 06/03/2019	18 18		1 1	425.00 425.00	0.10 4.60		Evaluate and respond to numerous correspondence. Continue to work on answering brief and motion to dismiss appeal.	ARCH ARCH
2998.0001	06/04/2019	6	Α	1	95.00	1.50	142.50	Investigate NRCP 7(b)(1) requirement to plead motions with particularity to include within Motion	ARCH
2998.0001	06/04/2019	18	Α	1	425.00	4.00	1,700.00	to Dismiss; discuss same with Jeffrey P. Luszeck. Continue to work on answering brief. AA2472	ARCH

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Client	Trans Date			Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 2998.00	001 Nelson, Eri	c L.							45.511
2998.0001	06/05/2019	18	Α	1	425.00	0.50	212.50	Supplement motion to dismiss.	ARCH
2998.0001	06/07/2019	18	Α	1	425.00	0.60	255.00	Evaluate and respond to correspondence. Confer	ARCH
2330,0001	00,01,201		• •					with Mark A. Solomon regarding	
2222 2224	06/07/0010	4		4	605.00	1.00	695.00	Review e-mail and redraft answering brief.	ARCH
2998.0001	06/07/2019	1	А	1	685.00	1.00	003.00		7111011
								Conference with Jeffrey P. Luszeck regarding	
2998.0001	06/09/2019	18	Α	1	425.00	3.00	1,275.00	Continue to work on answering brief.	ARCH
2998.0001	06/09/2019	1	Δ	1	685.00	0.50	342.50	Telephone conference with Jeffrey P. Luszeck	ARCH
2330.0001	00/03/2013	'		•	000.00	0.00	•	regarding	
								regarding	
									1551
2998,0001	06/10/2019	18	Α	1	425.00	2.90	1,232.50	Supplement and finalize answering brief. Confer	ARCH
								with Mark A. Solomon regarding	
2998.0001	06/10/2019	1	٨	1	685.00	1.00	685.00	Review and redraft answering brief. Conference with	ARCH
2330.0001	00/10/2019	'	~	•	003.00	1.00	000.55	Jeffrey P. Luszeck regarding Review final	
								brief.	
2998.0001	06/11/2019	18	Α	1	425.00	0.10	42.50	Evaluate order from supreme court. Evaluate	ARCH
	***							answering brief filed by Dawn Throne.	
2000 2001	00/05/0040	10		4	425.00	0.10	42.50	Evaluate upcoming deadlines and case proceeding.	ARCH
2998.0001	06/25/2019	18		1	425.00				ARCH
2998.0001	06/27/2019	18	Α	1	425.00	0.10		Evaluate correspondence from opposing counsel.	
2998.0001	06/28/2019	18	Α	1	425.00	0.20		Evaluate and respond to numerous correspondence.	ARCH
2998.0001	06/29/2019	18	Δ	1	425.00	1.60	680.00	Compare competing orders and begin outlining	ARCH
1000.000	00/25/2015			·				differences between same in preparation of drafting	
								correspondence to Judge Sullivan regarding	
								Continue to evaluate response to motion to	
								dismiss.	
2000 0001	07/01/2019	18	۸	1	425.00	1.50	637 50	Telephone conference with Dawn Throne and Josef	ARCH
2998.0001	07/01/2013	10	^	1	- 23.00	1.50	057.50	Karacsonyi.	
									ABCII
2998.0001	07/01/2019	1	Α	1	685.00	0.80		Review Lynita's Complaint.	ARCH
2998.0001	07/09/2019	18	Α	1	425.00	0.80	340.00	Continue to evaluate	ARCH
	,								
2000 0001	07/11/2010	10		1	425.00	0.70	297 50	Begin evaluating	ARCH
2998.0001	07/11/2019	18	А	ı	423.00	0.70	237.30	begin evaluating	
									45611
2998.0001	07/16/2019	18	Α	1	425.00	2.30	977.50	Continue to draft response to opposition to motion	ARCH
	•							to dismiss. Draft correspondence to Dawn Throne.	
2000 0001	07/10/2010	18	٨	1	425.00	0.10	42.50	Evaluate and respond to correspondence.	ARCH
2998.0001	07/18/2019							Evaluate and respond to correspondence.	ARCH
2998.0001	07/19/2019	18	Α	1	425.00	0.90	382.50	· · · · · · · · · · · · · · · · · · ·	ANCII
								Supplement and finalize reply to opposition to	
								motion to dismiss.	
2998.0001	07/24/2019	18	٨	1	425.00	0.30	127 50	Telephone conference with client.	ARCH
					425.00	0.20		Begin to evaluate appellate response.	ARCH
2998.0001	07/25/2019	18		1			500.00	Begin to evaluate appenate response.	
2998.0001	07/27/2019	18	Α	1	425.00	1. 6 0	680.00	Begin drafting response to Larry Bertsch's petition	ARCH
								for instructions.	
2998.0001	07/28/2019	18	Δ	1	425.00	0.70	297.50	Continue to draft response to Larry Bertsch's	ARCH
2336.0001	07/20/2019	10	^	•	-LJ.00	0.10	251.50	petition for instructions.	
									ARCH
2998.0001	07/29/2019	18	Α	1	425.00	0.10	42.50	Evaluate and respond to correspondence from Dawn	ARCH
								Throne.	
2998.0001	07/31/2019	18	Δ	1	425.00	1.00	425.00	Telephone conference with Dawn Throne. Draft	ARCH
2550.0001	07/31/2013	10	^		125.00	1100	120101	correspondence to same.	
								•	ARCH
2998.0001	08/02/2019	18	Α	1	425.00	0.50	212,50	Begin evaluating hearing dvd. Evaluate	ARCH
								correspondence from Dawn Throne.	
2998.0001	08/03/2019	18	Δ	1	425.00	1.00	425.00	Revise response to motion for instructions filed by	ARCH
2990.0001	00/03/2013	10	\sim		423.00	1.00	123100	Larry Bertsch.	
									ARCH
2998.0001	08/05/2019	18	Α	1	425.00	3.30	1,402.50	Continue to supplement response to Larry Bertsch's	ARCH
								motion for instructions.	
2000 0001	00/06/2010	5	٨	1	220.00	0.40	88.00	Confer with Jeffrey P. Luszeck; draft Joinder.	ARCH
2998.0001	08/06/2019							Continue to work on brief. Telephone conference	ARCH
2998.0001	08/06/2019	18	Α	1	425.00	0.40	170.00		MACH
								with opposing counsel.	
2998.0001	08/07/2019	18	Α	1	425.00	0.30	127.50	Supplement and finalize joinder.	ARCH
2998.0001	08/09/2019	18		1	425.00	0.40		Begin evaluating opposing counsel's brief regarding	ARCH
233Q.UUU1	00/03/2013	10	~	•	TEU.00	0.10		9	
								F 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ADCU
2998.0001	08/14/2019	18	Α	1	425.00	0.10	42.50	Evaluate and respond to correspondence with Dawn	ARCH
								Throne.	
2998.0001	08/16/2019	18	Α	1	425.00	1.50	637.50	Prepare for hearing. Telephone conference with	ARCH
2330.0001	00/10/2013	.0		•	0.00			Dawn Throne.	
			,	4	425.00	1.00	425.00	Prepare for upcoming hearing. Confer with Mark A.	ARCH
2998.0001	08/19/2019	18	Α	1	425.00	1.00	425.00	A A 2 472	AINCH
								AA2473	. 40

Client	Trans Date	Tkpr I	H Tcode/ P Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 2998.000)1 Neison, Eric	L.						
2998.0001	08/20/2019	18 /	A 1	425.00	5.50	2,337.50	Solomon regarding Prepare for, travel to and attend hearing. Confer with Mark A. Solomon regarding	ARCH
2998.0001	08/20/2019	18 /	A 1	425.00	0.20	85.00	Evaluate and respond to correspondence. Confer with Mark A. Solomon regarding	ARCH
2998.0001	08/21/2019	1 /	A 1	685.00	0.50	342.50	Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	08/22/2019	18 /	A 1	425.00	0.10	42.50	Evaluate correspondence.	ARCH
2998.0001	08/26/2019	18 /	A 1	425.00	0.30		Evaluate and respond to correspondence. Telephone conference with Dan Gerety.	ARCH
2998.0001	08/27/2019	18 /	A 1	425.00	0.10		Evaluate and respond to correspondence.	ARCH
2998.0001	09/06/2019	18 /	A 1	425.00	0.10		Evaluate and respond to correspondence regarding	ARCH
2998.0001	09/11/2019	18 /	A 1	425.00	0.10		Evaluate and respond to numerous correspondence.	ARCH
2998.0001	09/12/2019	18 /	A 1	425.00	0.70	297.50	Evaluate and respond to correspondence from counsel and Larry Bertsch. Prepare for and participate in conference call with all counsel.	ARCH
2998.0001	09/17/2019	18 /	A 1	425.00	0.20	85.00	Evaluate and respond to correspondence.	ARCH
2998.0001	09/18/2019	18 /	A 1	425.00	0.20	85.00	Evaluate and respond to numerous correspondence.	ARCH
2998.0001	09/19/2019	18 /	A 1	425.00	0.20	85.00	Evaluate numerous correspondence from Eric. Evaluate and respond to correspondence from Dan Gerety.	ARCH
2998.0001	10/01/2019	18 /	A 1	425.00	0.40	170.00	Evaluate Lynita's filing. Evaluate and respond to correspondence regarding	ARCH
2998.0001	10/02/2019	18 /	A 1	425.00	1.10	467.50	Prepare for and participate in telephone conference with Dan and Dawn. Begin outlining opposition to Lynita's motion.	ARCH
2 99 8.0001	10/07/2019	18 /	A 1	425.00	3.90	1,657.50	Draft response to Lynita's objection to initial inventory. Evaluate correspondence from Eric regarding	ARCH
2998.0001	10/07/2019	8 /	A 1	540.00	2.50	1,350.00	Review and draft response for tax related matters.	ARCH
2998.0001	10/08/2019	18 <i>A</i>	A 1	425.00	0.70	297.50	Supplement response to include statute of limitations section. Confer with Mark A. Solomon regarding Evaluate and respond to correspondence from Dawn and Eric.	ARCH
2998.0001	10/10/2019	18 /	A 1	425.00	0.40	170.00	Evaluate decision and order. Evaluate correspondence from Eric. Prepare for hearing.	ARCH
2998.0001	10/11/2019	18 A	A 1	425.00	2.80	1,190.00	Prepare for, travel to, and attend hearing.	ARCH
2998.0001	10/14/2019	18 /		425.00	0.20		Evaluate correspondence from Eric.	ARCH
2998.0001	10/15/2019	18 /		425.00	0.10	42.50	Draft correspondence to Eric.	ARCH
2998.0001	10/24/2019	18 /		425.00	0.80		Evaluate Bertsch's bills and prepare correspondence to Eric and Dawn regarding Begin drafting settlement offer.	ARCH
2998.0001	10/28/2019	18 <i>A</i>	A 1	425.00	0.60		Begin drafting settlement offer. Telephone conference with Eric. Evaluate multiple correspondence from Eric.	ARCH
2998.0001	10/29/2019	18 <i>A</i>	1	425.00	1.50		Draft correspondence to Josef regarding Evaluate correspondence from Eric regarding	ARCH
2998.0001	10/30/2019	18 <i>A</i>	A 1	425.00	0.20		Confer with Dawn regarding Evaluate and respond to numerous correspondence.	ARCH
2998.0001	10/31/2019	18 <i>A</i>	A 1	425.00	0.60	255.00	Supplement letter to Josef. Evaluate and respond to numerous correspondence. Evaluate Judge Sullivan's recent order. Evaluate	ARCH
2 99 8.0001	11/01/2019	18 <i>A</i>	A 1	425.00	0.20	85.00	Dawn's opposition to Bertsch's request for fees. Telephone conference with opposing counsel. Evaluate correspondence from same.	ARCH
2998.0001	11/04/2019	18 A	1	425.00	0.10		Evaluate and respond to correspondence from Josef. Email Eric regarding	ARCH
2998.0001	11/06/2019	18 A	A 1	425.00	0.10		Evaluate correspondence.	ARCH
2998.0001	11/08/2019	18 A	A 1	425.00	0.10		Evaluate correspondence.	ARCH
2998.0001	11/11/2019	18 A		425.00	0.10		Evaluate correspondence.	ARCH
2998.0001	11/13/2019	18 A	1	425.00	0.20		Telephone conference with Eric. Evaluate and respond to numerous correspondence from Eric and AA2474	ARCH

Dawn. Evaluate Bertsch's response to objection to fees Page	Client	Trans Date		H Tcode/ P Task Code	Rate	Hours to Bill	Amount		Ref#
298,0001 11/15/2019 18 A	Client ID 2998.000	01 Nelson, Eri	 c L.						
2986.0001 1/13/2019 18 A 1 425.00 0.30 1275.05 Evaluate and respond to numerous correspondence. ARCH 2298.0001 1/19/2019 18 A 1 425.00 0.50 1275.05 Continue to outline petition for sale for property. ARCH ARCH 2298.0001 1/12/20/2019 18 A 1 425.00 0.10 425.00 Evaluate correspondence. ARCH ARCH 2298.0001 1/12/20/2019 18 A 1 425.00 0.10 425.00 Evaluate correspondence. ARCH ARCH 2298.0001 1/12/20/2019 18 A 1 425.00 1.10 467.50 Supplement petition for sale off Lindell. Evaluate ARCH 2298.0001 1/12/20/2019 18 A 1 425.00 1.10 467.50 Supplement petition for sale off Lindell. Evaluate ARCH 2298.0001 1/12/20/200 18 A 1 450.00 1.10 45.00 Evaluate and respond to correspondence. ARCH 450.00 425								· -	
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2998.0001 02/11/2020 18 A 1 450.00 0.10 45.00 Evaluate correspondence from Eric. Telephone ARCH							125.00	Evaluate correspondence from Dawn Telephone	
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2998.0001 02/11/2020 18 A 1 450.00 0.10 45.00 Evaluate correspondence. ARCH 2998.0001 02/12/2020 18 A 1 450.00 0.50 225.00 Evaluate correspondence from Eric. Telephone conference with Dawn Throne. Evaluate correspondence from same. ARCH 2998.0001 02/13/2020 18 A 1 450.00 4.50 2,025.00 Draft supreme court settlement brief. Evaluate and respond to correspondence from Eric regarding ARCH 2998.0001 02/14/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to numerous correspondence. ARCH evaluate and respondence from Eric regarding ARCH 2998.0001 02/15/2020 18 A 1 450.00 1.40 630.00 Evaluate Dawn's proposed order. Evaluate correspondence from Eric regarding Evaluate Dawn's proposed order. Evaluate Evaluate 2998.0001 02/17/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to correspondence. Supplement settlement brief. 2998.0001 02/17/2020 18 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>									
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2998.0001 02/13/2020 18 A 1 450.00 4.50 2,025.00 Draft supreme court settlement brief. Evaluate and respond to correspondence from Eric regarding 2998.0001 02/14/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to numerous correspondence. ARCH 2998.0001 02/15/2020 18 A 1 450.00 1.40 630.00 Evaluate Dawn's proposed order. Evaluate ARCH correspondence from Eric regarding Evaluate 2998.0001 02/17/2020 18 A 1 450.00 0.40 180.00 Evaluate Dawn's proposed order. Evaluate Correspondence from Eric regarding Evaluate 2998.0001 02/17/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to correspondence. Supplement settlement brief. 2998.0001 02/18/2020 18 A 1 450.00 3.50 1,575.00 Prepare for, travel to and attend hearing. Supplement and finalize settlement conference									
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2998.0001 02/13/2020 18 A 1 450.00 4.50 2,025.00 Draft supreme court settlement brief. Evaluate and respond to correspondence from Eric regarding ARCH 2998.0001 02/14/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to numerous correspondence. ARCH ARCH 2998.0001 02/15/2020 18 A 1 450.00 1.40 630.00 Evaluate Dawn's proposed order. Evaluate correspondence from Eric regarding Evaluate Evaluate 2998.0001 02/17/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to correspondence. Supplement settlement brief. ARCH 2998.0001 02/18/2020 18 A 1 450.00 3.50 1,575.00 Prepare for, travel to and attend hearing. Supplement and finalize settlement conference ARCH									
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2998.0001 02/14/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to numerous correspondence. Evaluate	2990.0001	02/13/2020	10 7	,	450.00	4.50	2,025.00	· ·	
2998.0001 02/15/2020 18 A 1 450.00 1.40 630.00 Evaluate Dawn's proposed order. Evaluate correspondence from Eric regarding Evaluate Supplement settlement brief. 2998.0001 02/17/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to correspondence. ARCH Supplement settlement brief. 2998.0001 02/18/2020 18 A 1 450.00 3.50 1,575.00 Prepare for, travel to and attend hearing. ARCH Supplement and finalize settlement conference								respond to correspondence from site regarding	
2998.0001 02/15/2020 18 A 1 450.00 1.40 630.00 Evaluate Dawn's proposed order. Evaluate correspondence from Eric regarding Evaluate 3. Supplement settlement brief. 2998.0001 02/17/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to correspondence. ARCH Supplement settlement brief. 2998.0001 02/18/2020 18 A 1 450.00 3.50 1,575.00 Prepare for, travel to and attend hearing. ARCH Supplement and finalize settlement conference	2000 0001	02/14/2020	19 /	۸ 1	450.00	0.40	180.00	Evaluate and respond to numerous correspondence.	ARCH
correspondence from Eric regarding Evaluate Supplement settlement brief. Prepare for, travel to and attend hearing. ARCH Supplement and finalize settlement conference									ARCH
2998.0001 02/17/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to correspondence. ARCH Supplement settlement brief. 2998.0001 02/18/2020 18 A 1 450.00 3.50 1,575.00 Prepare for, travel to and attend hearing. ARCH Supplement and finalize settlement conference	2330.0001	UZJ 13/2020	10 /	,	750.00		550.00		
2998.0001 02/17/2020 18 A 1 450.00 0.40 180.00 Evaluate and respond to correspondence. ARCH 2998.0001 02/18/2020 18 A 1 450.00 3.50 1,575.00 Prepare for, travel to and attend hearing. ARCH Supplement and finalize settlement conference									
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Supplement settlement brief. 2998.0001 02/18/2020 18 A 1 450.00 3.50 1,575.00 Prepare for, travel to and attend hearing. ARCH Supplement and finalize settlement conference	2002 0001	02/17/2020	18 4	Δ 1	450.00	0.40	180.00		ARCH
2998.0001 02/18/2020 18 A 1 450.00 3.50 1,575.00 Prepare for, travel to and attend hearing. ARCH Supplement and finalize settlement conference	2550.0001	J2, 11,2020	.0 /	. '	150.00				
Supplement and finalize settlement conference	2998 0001	02/18/2020	18 /	Δ 1	450.00	3.50	1,575.00		ARCH
AA2475	2550,0001	,,		•		•	-	Supplement and finalize settlement conference	
								AA2475	

Client Client ID 2998.00	Trans <u>Date</u>	Tkpr P	Task Code	Rate	Hours to Bill	Amount		Ref#
Chefft ID 2990.00	OT MEISON, EN	C L.					brief.	
2998.0001	02/19/2020	18 A	. 1	450.00	0.40	180.00	Evaluate correspondence. Confer with Brian K. Steadman regarding	ARCH
2998,0001	02/24/2020	18 A	. 1	450.00	8.00	3.600.00	Prepare for, travel to and participate in mediation.	ARCH
2998.0001	02/25/2020	18 A		450.00	1.10		Evaluate correspondence. Numerous telephone	ARCH
2330.0001	02/23/2020	10 7	,	130.00	1.70		conferences with Eric Nelson. Telephone conference with Dawn Throne.	
2998.0001	02/26/2020	18 A	. 1	450.00	5.80	2,610.00	Prepare for, travel to and attend mediation. Confer with Dawn regarding	ARCH
2998.0001	02/26/2020	5 A	. 1	220.00	3.40	748.00	Confer with Jeffrey P. Luszeck; extensive review of	ARCH
							; research regarding ; prepare email to Jeffrey P. Luszeck.	
2998.0001	02/27/2020	18 A	. 1	450.00	0.10		Evaluate correspondence from Dawn and Eric.	ARCH
2998.0001	02/28/2020	5 A	. 1	220.00	3.80	836.00	Process flash drive from Larry Bertsch relating to	ARCH
							Nelson file: email to client regarding	4.0.511
2998.0001	03/02/2020	18 A	. 1	450.00	0.50	225.00	Evaluate and respond to correspondence regarding	ARCH
							Continue to evaluate response to order to show	
	67 (69 (969			220.00	0.20	44.00	cause. Confer with Roberto regarding	ARCH
2998.0001	03/02/2020	24 A	. 1	220.00	0.20	44.00	Meet with Jeff Luszeck regarding	ANCH
2998.0001	03/06/2020	18 A	. 1	450.00	0.10	45.00	Evaluate and respond to correspondence.	ARCH
2998.0001	03/06/2020	24 A		220.00	5.60		Reviewed background filings and orders, researched	ARCH
2550.0001	03,00,2020		•			.,	law, and began drafting opposition to response to order to show cause.	
2998.0001	03/09/2020	24 A	. 1	220.00	6.60	1,452.00	Drafted Opposition to Appellant's response to Order to Show Cause.	ARCH
2998.0001	03/10/2020	18 A	1	450.00	0.20	90.00	Confer with Roberto regarding	ARCH
2998.0001	03/10/2020	18 A	1	450.00	1.30	585.00	Supplement opposition to response to motion to show cause.	ARCH
2998.0001	03/12/2020	18 A	. 1	450.00	0.60	270.00	Supplement response. Evaluate joinder.	ARCH
2998.0001	03/13/2020	18 A		450.00	0.20		Telephone conference with Eric Nelson.	ARCH
2998.0001	03/14/2020	18 A		450.00	0.10		Draft correspondence to Dawn and Eric.	ARCH
2998.0001	03/16/2020	18 A		450.00	0.40	180.00	Evaluate and respond to numerous correspondence	ARCH
							regarding Telephone conference with Judge Sullivan's chambers.	
2998.0001	03/17/2020	18 A	1	450.00	0.90	405.00	Prepare for and participate in meeting with Eric. Telephone conference with Dawn Throne.	ARCH
2998.0001	03/18/2020	18 A	1	450.00	0.70	315.00	Evaluate Confer with Dawn Throne regarding Evaluate	ARCH
							Draft correspondence to Dawn Thorne regarding	
2998.0001	03/19/2020	18 A	1	450.00	1.50	675.00	Prepare for and participate in hearing. Evaluate competing order in preparation of hearing.	ARCH
2998.0001	03/20/2020	18 A	1	450.00	0.40	180.00	Evaluate quantum and respond to correspondence from Eric	
							and Dawn.	
2998.0001	03/23/2020	18 A	1	450.00	0.80	360.00	Draft correspondence to Dawn. Continue to evaluate	ARCH
2998.0001	03/24/2020	18 A	1	450.00	1.80	810.00	Continue to review listen to initial meeting between Larry and Eric.	ARCH
2998.0001	03/25/2020	18 A	1	450.00	0.50	225.00	Telephone conference with Eric. Evaluate status	ARCH
						ii	report filed by Lynita. Evaluate and	
2998.0001	03/26/2020	18 A	1	450.00	2.90		Prepare for and participate in hearing. Telephone conference with Eric prior to and after the hearing. Telephone conference with Dawn Throne. Draft correspondence to Dawn Throne. Evaluate order from Nevada Supreme Court.	ARCH
2998.0001	03/27/2020	18 A	1	450.00	0.10		Evaluate and respond to correspondence.	ARCH
2998.0001	03/21/2020	18 A	1	450.00	1.90		Continue to evaluate document production from	ARCH
2550.0001	\$\$,50,E0E0	10 11	•	,50.00	1.50		Larry Bertsch. Draft correspondence to Garrett AA2476	

Client	Trans Date	Tkpr	Н Тс <u>Р Та</u>	ode/ sk Code	Rate	Hours to Bill	Amount		Ref #
Client ID 2998.000)1 Nelson, Eric	L.						- u	
2998.0001	03/31/2020	18	Α	1	450.00	0.50	225.00	Chase regarding Continue to evaluate documents received from Larry Bertsch.	ARCH
2998.0001	04/02/2020	18	А	1	450.00	0.70	315.00	Evaluate and respond to correspondence from Dawn Throne. Evaluate multiple correspondence from Eric.	ARCH
	0.4.603.40000	10		4	450.00	0.40	190.00	Evaluate Work on matter.	ARCH
2998.0001	04/03/2020	18 .		1	450.00	0.60		Evaluate and respond to numerous correspondence.	ARCH
2998.0001	04/06/2020	18		1	450.00			Evaluate proposed order. Telephone conference with Dawn. Telephone	ARCH
2998.0001	04/07/2020	18 .	А	1	450.00	0.70	3 15.00	conference with Eric. Evaluate and respond to correspondence. Work on language contained within orders.	Alteri
2998.0001	04/08/2020	18 .	Α	1	450.00	1.90	855.00	Telephone conference with Dawn. Evaluate and respond to multiple correspondence from Eric. Evaluate Supreme Court Order in order determine findings regarding Draft correspondence regarding	ARCH
2998.0001	04/13/2020	18	A	1	450.00	0.20	90.00	Evaluate correspondence regarding	ARCH
2998.0001	04/13/2020	18	Α	1	450.00	0.40	180.00	Evaluate and respond to numerous correspondence regarding	ARCH
2998.0001	04/14/2020	18	Α	1	450.00	0.50	225.00	Evaluate and respond to numerous correspondence from opposing counsel. Begin evaluating Lynita's 8th post-disclosure appeal disclosures.	ARCH
2998,0001	04/15/2020	18	Α	1	450.00	0.20	90.00	Evaluate and respond to numerous correspondence.	ARCH
2998.0001	04/16/2020	18		1	450.00	0.40	180.00	Begin to evaluate 33 disclosures.	ARCH
2998.0001	04/18/2020	18		1	450.00	0.30	135.00	Evaluate numerous correspondence from Dawn	ARCH
2998.0001	04/20/2020	18		1	450.00	1.10		Throne's office. Evaluate correspondence from Eric. Evaluate response to alimony and child support	ARCH
2998.0001	04/20/2020	10 /						issues. Begin preparing for upcoming hearing. Continue evaluate recent disclosures.	A D C L L
2998.0001	04/21/2020	18	Α	1	450.00	0.10		Evaluate Lynita's first supplemental 16.1 disclosure.	ARCH
2998.0001	04/22/2020	18	A	1	450.00	0.30		Telephone conference with Dawn. Prepare for upcoming hearing.	ARCH
2998.0001	04/24/2020	18 ,	A	1	450.00	3.00	1,350.00	Telephone conferences with Eric and Dawn. Prepare for and participate i hearing. Evaluate numerous correspondence. Evaluate order from prior hearing and supplement the same.	ARCH
2998.0001	04/25/2020	18	Α	1	450.00	0.20	90.00	Evaluate multiple correspondence.	ARCH
2998.0001	04/26/2020	18		1	450.00	1.20	540.00	Evaluate and respond to correspondence from	ARCH
2330,000	0-1, E0, E 0E0							Dawn. Draft correspondence to Judge Sullivan regarding reques	
2998.0001	04/27/2020	18 /	A	1	450.00	0.50	225.00	Telephone conference with Mark A. Solomon regarding Telephone conference with Dawn Throne regarding	ARCH
2998.0001	04/27/2020	1 /	Α	1	685.00	0.10	68.50	Telephone conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	04/28/2020	18 /	A	1	450.00	0.30		Continue to graft correspondence to Judge Sullivan regarding . Evaluate trial scheduling order.	ARCH
2998.0001	04/30/2020	18 /	А	1	450.00	1.80		Draft correspondence to opposing counsel. Evaluate and respond to correspondence from Dawn Throne. Telephone conference with Eric. Begin outlining motion for determination of burden at trial.	ARCH
2998.0001	05/01/2020	18 /	Α	1	450.00	0.20		Evaluate and respond to correspondence.	ARCH
2998.0001	05/01/2020	18 /		1	450.00	0.50	225.00	Confer with Hailey regarding Continue to work on said motion.	
2998.0001	05/01/2020	23 /	Α	1	115.00	0.10		Confer with Jeffrey P. Luszeck regarding	ARCH

Client	Trans <u>Date</u>	Tkpr P	Tcode/	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.00	01 Nelson, Eric	c L.					needed for motion for determination of privilege.	
2998.0001	05/04/2020	18 A	1	450.00	1.40	630.00	Continue to work on motion for determination of burden at trial. Telephone conference with Dawn Throne.	ARCH
2998.0001	05/04/2020	23 A	. 1	115.00	3.10	356.50	Conduct legal research regarding:	ARCH
2998.0001	05/05/2020	18 A	. 1	450.00	0.40	180.00	; submit to Jeffrey P. Luszeck for review. Evaluate correspondence from opposing counsel to Judge Sullivan. Draft email to court. Begin drafting substantive response to correspondence.	ARCH
2998.0001	05/06/2020	18 A	. 1	450.00	0.60	270.00	Supplement and finalize competing order and correspondence to Judge Sullivan. Telephone conference with Dawn Throne. Evaluate and	ARCH
2998.0001	05/07/2020	18 A	1	450.00	1.70	765.00	respond to correspondence from Dawn Throne. Continue to work on motion for determination of burden of proof. Evaluate numerous correspondence from opposing counsel.	ARCH
2998.0001	05/08/2020	18 A	1	450.00	0.90	405.00	Evaluate and respond to numerous correspondence. Supplement motion for determination of burden at trial.	ARCH
2998.0001	05/11/2020	18 A	1	450.00	0.20	90.00	Evaluate and respond to correspondence.	ARCH
2998.0001	05/12/2020	18 A		450.00	0.60		Evaluate and respond to numerous correspondence. Work on issues relating to	ARCH
2998.0001	05/14/2020	18 A	1	450.00	1.00	450.00	Evaluate and respond to correspondence. Prepare for and participate in telephone conference.	ARCH
2998.0001	05/16/2020	18 A	1	450.00	0.30	135.00	Evaluate proposed revisions to motion for determination. Evaluate numerous correspondence relating to the same.	ARCH
2998.0001	05/18/2020	18 A	1	450.00	0.20	90.00	Supplement and finalize motion for determination at trial.	ARCH
2998.0001	05/21/2020	18 A	1	450.00	0.20	90.00	Draft and respond to correspondence to Dawn. Evaluate joinder.	ARCH
2998.0001	05/26/2020	18 A	1	450.00	0.50	225.00	Draft ex parte application for an order shortening time. Evaluate and respond to correspondence from Eric.	ARCH
2998.0001	05/27/2020	18 A	1	450.00	0.60	270.00	Evaluate and respond to correspondence. Supplement and finalize ex parte application for an Order Shortening Time.	ARCH
2998.0001	05/28/2020	18 A	1	450.00	0.50	225.00	Telephone conference with Dawn. Evaluate and respond to correspondence.	ARCH
2998.0001	05/31/2020	18 A	1	450.00	0.10	45.00	Evaluate and respond to correspondence.	ARCH
2998.0001	06/01/2020	18 A		450.00	0.50		Evaluate and respond to numerous correspondence from Eric and Dawn. Telephone conference with Eric. Telephone conference with opposing counsel.	ARCH
2998.0001	06/02/2020	18 A	١ 1	450.00	0.20	90.00	Evaluate and respond to correspondence.	ARCH
2998.0001	06/03/2020	18 A		450.00	0.80		Prepare for and participate in telephone conference with Eric and Dawn. Evaluate correspondence.	ARCH
2998.0001	06/04/2020	18 A	1	450.00	0.10	45.00	Telephone conference with opposing counsel.	ARCH
2998.0001	06/05/2020	18 A		450.00	0.20		Evaluate and respond to correspondence.	ARCH
2998.0001	06/08/2020	18 A		450.00	1.30		Prepare for and participate in telephone conference with Eric Nelson. Telephone conference with Dan Gerety. Evaluate and respond to correspondence from Dawn Throne.	ARCH
2998.0001	06/10/2020	18 A	1	450.00	1.60	720.00	Prepare for and participate in separate telephone conferences with opposing counsel, Eric and Dawn.	ARCH
2998.0001	06/11/2020	18 A	1	450.00	0.30	135.00	Evaluate and respond to correspondence.	ARCH
2998.0001	06/12/2020	18 A		450.00	0.20	90.00	Evaluate opposition to motion for determination of trial.	ARCH
2998.0001	06/15/2020	18 A	1	450.00	1.40	630.00	Telephone conference with Dawn Throne. Begin outlining reply to opposition to motion for determination of privilege.	ARCH
2998.0001	06/15/2020	1 A	1	685.00	0.20	137.00	Review Jeffrey P. Luszeck's e-mail regarding	ARCH
2998.0001	06/16/2020	18 A	1	450.00	1.90	855.00	Evaluate and respond to correspondence from AA2478	ARCH

Client	Trans Date			Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 2998.000)1 Neison, Eri	c L.							
								Dawn. Work on issues relating Continue to work on reply to opposition to motion for determination of trial.	
2998.0001	06/18/2020	18	Α	1	450.00	0.60	270.00	Continue to work on reply to opposition to motion for determination.	ARCH
2998.0001	06/19/2020	18	Α	1	450.00	1.40	630.00	Evaluate and respond to correspondence. Telephone conference with Eric Nelson. Continue to draft reply to opposition to motion for determination of burden of proof at trial.	ARCH
2998.0001	06/20/2020	18	Α	1	450.00	1.30	585.00	Continue to draft reply to opposition to motion for determination of burden of proof.	ARCH
2998.0001	06/22/2020	18	Α	1	450.00	0.30		Evaluate and respond to correspondence from court and Dawn Throne.	ARCH
2998.0001	06/23/2020	18	Α	1	450.00	0.40		Telephone conference with Dawn Throne. Evaluate correspondence from realtor.	ARCH
2998.0001	06/28/2020	18	Α	1	450.00	0.10	45.00	Evaluate correspondence from Dawn Throne.	ARCH
2998,0001	06/29/2020	18		1	450.00	0.10	45.00	Voicemail for Dawn Throne.	ARCH
2998.0001	06/30/2020	18		1	450.00	0.20	90.00	Evaluate and respond to correspondence.	ARCH
				1	450.00	1.40		Telephone conference with Shawn King. Telephone	ARCH
2998.0001	07/01/2020	18	A	ı	450.00	1,40		conference with Josef. Supplement reply to motion for determination of burden of proof.	
2998.0001	07/06/2020	18	Α	1	450.00	0.50		Continue to supplement reply to opposition for motion for determination of burden of proof at trial.	ARCH
2998.0001	07/0 7 /2020	18	Α	1	450.00	0.40		Evaluate and respond to correspondence from Eric and Dawn. Supplement and finalize reply to opposition to motion for determination.	ARCH
2998.0001	07/09/2020	18	Α	1	450.00	1.60	720.00	Evaluate Supreme Court order. Evaluate and respond to numerous correspondence from Eric and Dawn. Telephone conference with Eric.	ARCH
2998.0001	07/10/2020	18	Α	1	450.00	0.70	315.00	Begin outlining issues to address in status report/motion for sale of Lindell.	ARCH
2998.0001	07/13/2020	18	Α	1	450.00	2.50		Continue to work on status report. Telephone conference with Eric.	ARCH
2998.0001	07/15/2020	18	Α	1	450.00	0.80	360.00	Begin preparing for upcoming hearing. Evaluate correspondence from Josef dated July 10.	ARCH
2998.0001	07/16/2020	18	Α	1	450.00	0.40		Evaluate and respond to correspondence. Supplement and finalize status report regarding	ARCH
2998.0001	07/16/2020	18	Α	1	450.00	1.70		Evaluate and respond to numerous correspondence from Nancy. Telephone conference with Nancy. Evaluate and respond to correspondence from Kendal Weisenmiller.	ARCH
2998.0001	07/17/2020	18	Δ	1	450.00	0.30	135.00	Begin preparing for upcoming hearing.	ARCH
2998.0001	07/18/2020	18		1	450.00	0.30		Evaluate status report prepared by Dawn Throne.	ARCH
		18		1	450.00	1.60		Prepare for and participate in hearing.	ARCH
2998.0001	07/21/2020							Telephone conference with Dawn Throne.	ARCH
2998.0001	07/24/2020	18		1	450.00	0.20			ARCH
2998.0001	07/29/2020	18 18		1	450.00 450.00	0.50 0.20		Work on issues relating Evaluate correspondence from opposing counsel.	ARCH
2998.0001	07/30/2020	18		1	450.00	0.40		Voicemail for Shawn King. Evaluate and respond to numerous correspondence	ARCH
2998.0001	07/31/2020	18	А	l	450.00			from Dawn and client. Begin evaluating petition for writ.	
2998.0001	08/01/2020	18	Α	1	450.00	0.50		Continue to evaluate Lynita's petition for writ and analyze the same.	ARCH
2998.0001	08/03/2020	18	Α	1	450.00	0.20		Evaluate and respond to correspondence.	ARCH
2998.0001	08/10/2020	18	Α	1	450.00	0.30		Evaluate and respond to correspondence from Dawn and opposing counsel.	ARCH
2998.0001	08/11/2020	18	Α	1	450.00	0.80		Draft notice of Lynita Nelson's failure to file response to expenses of Brian Head Cabin.	ARCH
2998.0001	08/17/2020	18	Α	1	450.00	0.10		Evaluate and respond to correspondence.	ARCH
2998.0001	08/17/2020		A	1	220.00	0.50		Confer with Jeffrey P. Luszeck; review court docket regarding	ARCH
								Thursday 02/00/202	2 70 25

Detail Fee Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date	Tkpr	H Tcode/ P Task Code	e Rate	Hours to Bill	Amount		Ref #
Client ID 2998.000							- 1 1	ARCH
2998.0001 2998.0001	08/19/2020 08/20/2020	18 <i>i</i>		450.00 450.00	0.10 1.60		Evaluate and respond to correspondence. Draft motion for ruling on motions. Evaluate and respond to correspondence. Evaluate supreme court order.	ARCH
2998.0001	08/21/2020	18 /	A 1	450.00	0.30	135.00	Evaluate and respond to numerous correspondence. Confer with Mark A. Solomon regarding	ARCH
2998.0001	08/24/2020	18 /	A 1	450.00	0.70	315.00	Evaluate and respond to numerous correspondence. Confer with Brian K. Steadman regarding Evaluate Evaluate	ARCH
2998.0001	08/24/2020	1 4	A 1	685.00	0.20		Review Eric and Jeffrey P. Luszeck's e-mails regarding	ARCH
2998.0001	08/25/2020	18	A 1	450.00	0.10	45.00	Evaluate and respond to correspondence.	ARCH
2998.0001	08/26/2020	18 /	A 1	450.00	1.50		Confer with Mark A. Solomon regarding Conduct research regarding Draft correspondence to Eric regarding	ARCH
2998.0001	08/26/2020	1 /	A 1	685.00	0.10		Conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	08/27/2020	18 /	A 1	450.00	0.20		Evaluate correspondence from property manager. Begin evaluating objection to Brian Head expenses.	ARCH
2998.0001	08/28/2020	18 /	A 1	450.00	1.20	540.00	Telephone conference with Dawn Throne. Continue to review objection to Brian Head expenses. Outline response to same.	ARCH
2998.0001	08/28/2020	23 /	A 1	115.00	2.20	253.00	Confer with Jeffrey P. Luszeck; review Objection to proof of expenses; legal research regarding ; submit findings to Jeffrey P. Luszeck for review.	ARCH
2998.0001	08/31/2020	18 /	A 1	450.00	3.20	1,440.00	Begin drafting response to objection to Brian Head expenses. Telephone conference with Eric regarding	ARCH
2998.0001	08/31/2020	23	A 1	115.00	0.70	80.50	Review Objection; confer with Jeffrey P. Luszeck regarding legal research ; legal research .	ARCH
2998.0001	09/01/2020	18 .	A 1	450.00	1.00	450.00	Continue to work on response to Lynita's objection to proof of expenses for Brian Head Cabin	ARCH
2998.0001	09/01/2020	23 /	A 1	115.00	0.80	92.00	Continue legal research regarding review cases cited in objection; draft memorandum on the same.	ARCH
2998.0001	09/02/2020	18	A 1	450.00	0.60	270.00	Supplement response to objection to Brian Head expenses.	ARCH
2998.0001	09/02/2020	23	A 1	115.00	1.20	138.00	Continue drafting memorandum regarding submit same to Jeffrey P. Luszeck for review.	ARCH
2998.0001	09/08/2020	18 /	A 1	450.00	0.50	225.00	Supplement response to opposition to Brian Head Cabin expenses. Evaluate and respond to correspondence from Eric and Dawn.	ARCH
2998.0001	09/09/2020	18	A 1	450.00	1.50	675.00	Work on answer to petition for writ of mandamus.	ARCH
2998.0001	09/10/2020	18		450.00	1.30	585.00	Continue to work on answer to writ of mandamus.	ARCH
2998.0001	09/11/2020	18	A 1	450.00	1.70		Continue to work on answer to writ. Telephone conference with Dawn Throne regarding	ARCH ARCH
2998.0001	09/12/2020	18		450.00	0.20		Evaluate proposed management contract. Continue to work on answer to petition.	ARCH
2998.0001	09/12/2020	18 /		450.00	1.60 3.80		Continue to work on answer to petition. Continue to work on answer to writ. Evaluate and	ARCH
2 99 8.0001	09/14/2020	18 /		450.00		·	respond to correspondence regarding	
2998.0001	09/15/2020	18 /	A 1	450.00	2.40		Continue to supplement answer to writ. Confer with Gretta regarding Evaluate correspondence from Dawn regarding Draft correspondence to Susan Cotton regarding	ARCH
2998.0001	09/16/2020	18		450.00	1.00		Supplement and finalize answer to petition.	ARCH
2998.0001	09/18/2020	18		450.00	0.10		Evaluate correspondence.	ARCH ARCH
2998.0001	09/21/2020	18		450.00	0.10		Draft correspondence to Josef.	ARCH
2998.0001	09/23/2020	18 /		450.00	0.10		Evaluate correspondence.	ARCH
2998.0001	09/25/2020	18 /	A 1	450.00	0.20	90.00	Evaluate and respond to numerous correspondence. AA2480 Thursday 02/09/202	

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Client	Trans Date		P Tas	de/ k Code	Rate	to Bill	Amount		Ref #
Client ID 2998.00	01 Nelson, Eric	c L.							ABCII
2998.0001	09/28/2020	18	Α	1	450.00	0.90	405.00	Evaluate and respond to correspondence. Prepare for and participate telephone conference with Eric and Dawn.	ARCH
2998.0001	09/29/2020	18	Α	1	450.00	0.20	90.00	Evaluate docket in preparation of determining next case action plan.	ARCH
2998.0001	09/30/2020	18	Δ	1	450.00	0.80	360.00	Evaluate reply to answer to petition.	ARCH
2998.0001	10/01/2020	18		1	450.00	0.10		Evaluate and respond to correspondence.	ARCH
2998.0001	10/02/2020	18		1	450.00	0.40		Evaluate correspondence. Work on matter.	ARCH
2998.0001	10/05/2020	18		1	450.00	0.20		Evaluate and respond to correspondence.	ARCH
2998.0001	10/03/2020	18		1	450.00	0.50		Evaluate and respond to correspondence.	ARCH
2330.0001	10/01/2020	10	,,	•	130.00			Telephone conference with Eric.	
2998.0001	10/08/2020	18	Δ	1	450.00	0.20	90.00	Evaluate and respond to correspondence.	ARCH
2998.0001	10/09/2020	18		1	450.00	0.40		Prepare for and participate in telephone conference	ARCH
2990.0001	10,03,2020	10	, ,	•	1,50.00			with opposing counsel regarding	
2998.0001	10/09/2020	18	Α	1	450.00	0.20	90.00	Evaluate Lynita's expert disclosure.	ARCH
2998.0001	10/12/2020	18	Α	1	450.00	0.20	90.00	Evaluate and respond to correspondence.	ARCH
2998.0001	10/18/2020	18	Α	1	450.00	0.20	90.00	Evaluate stipulation and order from opposing counsel. Draft correspondence to Eric Nelson regarding same.	ARCH
2998.0001	10/19/2020	18	A	1	450.00	0.70	315.00	Supplement request for status check. Evaluate and respond to correspondence regarding Begin to evaluate request for production of documents.	ARCH
2998.0001	10/19/2020	5	Α	1	220.00	1.00	220.00	Confer with Jeffrey P. Luszeck; review and revise Stipulation and Order for Status Check Regarding ; advise Jeffrey P. Luszeck regarding	ARCH
2998.0001	10/22/2020	18	Α	1	450.00	1.50	675.00	Prepare for and participate in telephone conference with Eric. Evaluate discovery responses.	ARCH
2998.0001	10/23/2020	18	Α	1	450.00	0.30	135.00	Evaluate correspondence from Dawn Throne. Draft correspondence to opposing counsel.	ARCH
2998.0001	10/26/2020	18	Α	1	450.00	0.10	45.00	Draft correspondence to Shawn King.	ARCH
2998.0001	10/27/2020	18	Α	1	450.00	1.00	450.00	Evaluate multiple orders from Judge Sullivan. Draft numerous correspondence to/from Eric and Dawn regarding	ARCH
2998.0001	10/28/2020	18	Α	1	450.00	1.40		Prepare for and participate in telephone conference with conference.	ARCH
2998.0001	10/29/2020	18	Α	1	450.00	0.60	270.00	Work on responses to discovery. Evaluate correspondence. Continue to work on issues relating to orders.	ARCH
2998.0001	10/30/2020	18	Α	1	450.00	0.40		Telephone conference with Shawn King.	ARCH
2998.0001	11/02/2020	18		1	450.00	1.10	495.00	Continue to evaluate orders and analyze ramifications of same. Evaluate and respond to numerous correspondence from Dawn. Confer with Jacob Crawley regarding	ARCH
2998.0001	11/02/2020	6	A	1	225.00	0.40	90.00	Confer with Jeffrey P. Luszeck regarding	ARCH
2998.0001	11/02/2020	1 .	Α	1	685.00	0.50	342.50	Review Jeffrey P. Luszeck's e-mail. Review Judge Sullivan's order regarding Telephone conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	11/03/2020	18	Δ	1	450.00	0.10	45.00	Evaluate correspondence.	ARCH
2998.0001	11/04/2020	18		1	450.00	0.40		Evaluate correspondence. Prepare for meeting with Eric.	ARCH
2998.0001	11/05/2020	18	A	1	450.00	2.20		Prepare for and participate in conference with Eric Nelson. Telephone conference with Dawn Throne regarding	ARCH
2998.0001	11/06/2020	18	Α	1	450.00	0.20		Evaluate correspondence from Eric.	ARCH
2998.0001	11/09/2020	18		1	450.00	1.80		Evaluate voluminous documentation provided from Eric. Draft correspondence to Josef.	ARCH
2998.0001	11/10/2020	18	Α	1	450.00	0.20		Evaluate numerous correspondence.	ARCH
2998.0001	11/12/2020	18	Α	1	450.00	0.30		Telephone conference with Shawn King.	ARCH
2998.0001	11/13/2020	6 .	A	1	225.00	0.30	67.50	Confer with Jeffrey P. Luszeck regarding	ARCH
								AA2481	20.10.25

Page: 21 **Detail Fee Transaction File List** Date: 02/09/2023 Solomon Dwiggins Freer & Steadman, Ltd. Hours Trans H Tcode/ Ref# Tkpr P Task Code Client Date Rate to Bill **Amount** Client ID 2998.0001 Nelson, Eric L. 135.00 Evaluate and respond to correspondence. Work on ARCH 0.30 2998.0001 11/13/2020 18 A 1 450.00 **ARCH** 450.00 Telephone conference with Dawn Throne. Outline 18 A 450.00 1.00 1 2998.0001 11/16/2020 motion for protective order. Confer with Jacob Crawley regarding Evaluate correspondence regarding 1,665.00 Confer with Jeffrey P. Luszeck regarding ARCH 6 A 1 225.00 7.40 2998.0001 11/16/2020 conduct extensive legal research 📺; begin draft regarding Motion for Protective Order, review and analyze deposition transcript of Joseph Leauanae to incorporate testimony into same. ARCH 450.00 1.10 495.00 Confer with Jacob Crawley regarding 11/17/2020 18 A 1 2998.0001 Begin evaluate draft of same. **ARCH** 1.237.50 Continue draft Motion for Protective Order; multiple 2998.0001 11/17/2020 6 A 1 225.00 5.50 conferences with Jeffrey P. Luszeck regarding 1,620.00 Supplement motion for protective order. Evaluate ARCH 3.60 450.00 2998,0001 11/18/2020 18 A 1 correspondence from opposing counsel. Telephone conference with Dawn Throne. ARCH 6.30 1,417.50 Confer with Jeffrey P. Luszeck regarding edits to 1 225.00 2998.0001 11/18/2020 6 A Motion for Protective Order; correspond with Dawn Throne; draft edits to Motion for Protective Order, incorporating Dawn and Jeffrey P. Luszeck edits. ARCH 45.00 Evaluate joinder. 0.10 450.00 2998.0001 11/23/2020 18 A 1 0.20 90.00 Evaluate numerous correspondence. Telephone ARCH 450.00 2998.0001 11/24/2020 18 A 1 conference with Eric Nelson. ARCH 90.00 Draft correspondence to opposing counsel. 18 A 450.00 0.20 2998.0001 11/25/2020 1 ARCH 18 A 1 450.00 0.30 135.00 Evaluate and respond to correspondence. 12/02/2020 2998.0001 ARCH 90.00 Evaluate and respond to correspondence. 450.00 0.20 2998.0001 12/03/2020 18 A 1 ARCH 225.00 Telephone conference with Dawn Throne. Evaluate 2998.0001 450.00 0.50 12/04/2020 18 A numerous correspondence. 90.00 Work on issues relating ARCH 450.00 0.20 12/05/2020 18 A 1 2998.0001 ARCH 450.00 0.10 45.00 Telephone conference with Josef. 12/07/2020 18 A 1 2998.0001 ARCH 450.00 0.20 90.00 Evaluate and respond to correspondence. 12/08/2020 18 A 2998.0001 1 ARCH 450.00 0.10 45.00 Evaluate and respond to correspondence. 2998.0001 12/09/2020 18 A 1 ARCH 45.00 Evaluate correspondence. 2998.0001 12/11/2020 18 A 1 450.00 0.10 ARCH 225.00 Evaluate status report and numerous 18 A 1 450.00 0.50 2998.0001 12/12/2020 correspondence regarding same. 0.20 90.00 Evaluate status report filed by Lynita. ARCH 18 A 450.00 2998.0001 12/14/2020 1 ARCH 720,00 Prepare for and participate in hearing. 450.00 1.60 2998.0001 12/15/2020 18 A 1 ARCH 675.00 Begin drafting status report. 12/17/2020 18 A 1 450.00 1.50 2998.0001 ARCH 1.10 495.00 Continue working on status report. 18 A 1 450.00 2998.0001 12/18/2020 ARCH 308.00 Telephone call with Jeffrey P. Luszeck regarding 12/21/2020 5 A 220.00 1.40 2998.0001 , review and edit the same; file and serve Status Report; telephone call with and e-mail to Law Clerk for Judge Sullivan regarding ARCH 90.00 Evaluate and respond to correspondence. 450.00 0.20 2998.0001 12/21/2020 18 A 1 ARCH 66.00 Confer with Jeffrey P. Luszeck regarding 220.00 0.30 12/22/2020 5 A 1 2998,0001 telephone call and e-mail to Chambers regarding ; receipt of e-mails from Chambers. ARCH 675.00 Prepare and participate in status check. 450.00 1.50 2998.0001 12/22/2020 18 A 1 135.00 Evaluate and respond to correspondence. ARCH 0.30 18 A 1 450.00 2998.0001 12/23/2020 ARCH 0.30 135.00 Begin to evaluate opposition to motion for 2998.0001 12/26/2020 18 A 1 450.00 protective order. ARCH 202.50 Review and analyze Opposition to Motion for 0.90 6 A 225.00 2998.0001 12/31/2020

AA2482

ARCH

ARCH

ARCH

Protective Order.

94.00 Evaluate and respond to correspondence.

analysis of Lindell Offices Leases.

264.00 Confer with Jeffrey P. Luszeck; begin review and

564.00 Prepare for status check. Evaluate and respond to

numerous correspondence regarding Evaluate orders.

2998.0001

2998.0001

2998.0001

18 A

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01/03/2021

01/04/2021

01/04/2021

470.00

220.00

470.00

0.20

1.20

1.20

Client	Trans Date	Tkpr		Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.000 2998.0001	01/05/2021	L. 5	Α	1	220.00	1.30	286.00	Complete lease comparison; advise Jeffrey P. Luszeck regarding	ARCH
2998.0001	01/05/2021	7	Α	1	340.00	1.80	612.00	Confer with Jeffrey P. Luszeck regarding discuss upcoming trial and strategy; discuss Motion for Protective Order, Opposition, and filing a Reply in Support of Motion. Review and evaluate Motion for Protective Order and Opposition and Countermotion thereto. Review Exhibits attached to Motion for Protective Order.	ARCH
2998.0001	01/05/2021	18	Α	1	470.00	1.50	705.00	Evaluate and respond to correspondence. Begin drafting status report in preparation for upcoming status check.	ARCH
2998.0001	01/06/2021	18	Α	1	470.00	0.80	376.00	Evaluate and respond to correspondence. Continue to work on status report.	ARCH
2998.0001	01/06/2021	18	Α	1	470.00	0.40		Evaluate and respond to correspondence.	ARCH
2998.0001	01/07/2021	7	Α	1	340.00	0.30	102.00	Conference with Jeffrey P. Luszeck regarding Review Motion for Protective Order and Opposition thereto.	ARCH
2998.0001	01/07/2021	18	Α	1	470.00	0.50	235.00	Evaluate and respond to numerous correspondence. Outline status report.	ARCH
2998.0001	01/08/2021	18	Α	1	470.00	0.90	423.00	Evaluate and respond to numerous correspondence. Continue to outline issues relating	ARCH
2998.0001	01/11/2021	7	Α	1	340.00	2.20	748.00	Continue evaluating Opposition to Motion for Protective Order; continue evaluating Requests for Production of Documents and all exhibits attached to Appendix; research statutory and case law regarding Continue drafting Reply in Support of Motion to Dismiss.	ARCH
2998.0001	01/11/2021	18	Α	1	470.00	2.60	1,222.00	Draft status report. Evaluate and respond to numerous correspondence.	ARCH
2998.0001	01/12/2021	7	Α	1	340.00	2.00		Confer with Jeffrey P. Luszeck regarding , continue evaluating Appendix and attached exhibits; research case law regarding continue drafting Reply in Support of Motion. Confer with Jeffrey P. Luszeck regarding begin extensive revisions to the same.	ARCH
2998.0001	01/12/2021	18	Α	1	470.00	3.60		Prepare for and participate in hearing. Work on issues relating to the lease. Finalize Reply to Opposition to Motion for Protective Order.	ARCH
2998.0001	01/13/2021	18	Α	1	470.00	0.60		Evaluate and respond to numerous correspondence. Evaluate revised lease agreement.	ARCH
2998.0001	01/14/2021	18	Α	1	470.00	0.40		Compare leases. Evaluate and respond to correspondence.	ARCH
2998.0001	01/15/2021	18	Α	1	470.00	0.60		Telephone conference with Eric. Evaluate and respond to numerous correspondence.	ARCH
2998.0001	01/19/2021	18		1	470.00	0.30		Evaluate and respond to numerous correspondence.	ARCH
2998.0001	01/20/2021	18	Α	1	470.00	0.30	141.00	Evaluate multiple correspondence. Review opposition to motion for protective order.	ARCH
2000 0004	01/21/2021	18	۸	1	470.00	0.20	94 00	Evaluate and respond to numerous correspondence.	ARCH
2998.0001 2998.0001	01/21/2021 01/21/2021	7		1	340.00	0.30		Review and evaluate Eric L. Nelson's Individually, and in his Capacity as Investment Trustee of the Eric L. nelson Nevada Trust, dated May 30, 2021 Joinder in Matt Klabacka's Reply in Support of Motion for Protective Order. Analyze and evaluate Opposition to Defendant's Objection to Plaintiff's Subpoena Duces Tecum, and Motion for Protective Order and for Attorney's Fees and Costs. AA2483	ARCH

				T/		Hours			
Client	Trans Date	_ 		Tcode/ Task Code	Rate	to Bill	Amount		Ref#
Client ID 2998.000 2998.0001	01 Nelson, Eric 01/22/2021	c L. 18	Α	1	470.00	0.30	141.00	Evaluate and respond to correspondence. Telephone conference with Eric Nelson.	ARCH
2998.0001	01/25/2021	18	Α	1	470.00	0.70	329.00	Prepare for hearing. Evaluate and respond to numerous correspondence.	ARCH
2998.0001	01/26/2021	18	Α	1	470.00	3.40	1,598.00	Prepare for and participate in hearing. Telephone conference with Eric Nelson and Michaelle Hauser.	ARCH
2998.0001 2998.0001	01/27/2021 01/28/2021	18 18		1 1	470.00 470.00	0.40 0.30		Evaluate and respond to correspondence. Supplement order from January 26 hearing. Draft correspondence regarding	ARCH ARCH
2998.0001 2998.0001	01/29/2021 01/31/2021	18 18		1 1	470.00 470.00	0.20 0.40		Evaluate and respond to correspondence. Evaluate and respond to numerous correspondence.	ARCH ARCH
2330.0001	01/31/2021		•	·				Brief review of subpoena duces tecum issued by Lynita.	10511
2998.0001	02/01/2021	18	Α	1	470.00	0.40		Evaluate and respond to numerous correspondence. Work on issues relating to subpoena duces tecum.	ARCH ARCH
2998.0001 2998.0001	02/02/2021 02/03/2021	18 18		1 1	470.00 470.00	0.10 1.70		Review and analyze correspondence. Draft discovery conference correspondence to opposing counsel. Evaluate and respond to	ARCH
								numerous correspondence from opposing counsel. Telephone conference with Michelle. Confer with	
2998.0001	02/03/2021	7	Α	1	340.00	0.30	102.00	Josh Hood regarding Review Amended Management and Scheduling Order; prepare for and attend conference with	ARCH
								Jeffrey P. Luszeck regarding retention of a rebuttal expert witness, issues concerning	
2998.0001	02/05/2021	18	Α	1	470.00	3.10	1,457.00	Telephone conferences with Michelle and Eric.	ARCH
								Review and analyze numerous correspondence to and from Josef K. Begin drafting motion for	
2998.0001	02/05/2021	7	Α	1	340.00	0.20	68.00	protective order. Receipt and review correspondence and several emails regarding	ARCH
2998.0001	02/06/2021	18	Α	1	470.00	0.80		Evaluate and respond to numerous correspondence regarding	ARCH
2998.0001	02/08/2021	18	Α	1	470.00	1.20	564.00	Telephone conference with Eric and Michelle. Review and analyze correspondence. Evaluate issues regarding	ARCH
2998.0001	02/11/2021	18	Α	1	470.00	0.70	329.00	Numerous telephone conferences with Eric. Confer with Josh Hood regarding Evaluate	ARCH
								correspondence from Eric regarding . Draft	
2998.0001	02/11/2021	7	Α	1	340.00	2.70	918.00	correspondence to Josef K. regarding Continue researching Nevada statutory and case law regarding	ARCH
								continue	
								Begin drafting Motion to Compel Parties to Enter into Confidentiality Agreement. Begin drafting proposed Confidentiality Agreement.	
2998.0001	02/12/2021	7	Α	1	340.00	2.00	680.00	Continue drafting Motion to Compel Parties to Enter into Confidentiality Agreement. Continue drafting	ARCH
								proposed Confidentiality Agreement. Confer with Jeffrey P. Luszeck regarding Revise Advisor droft consists Michael Hauser and Fris	
								Motion; draft email to Michelle Hauser and Eric Nelson regarding Finalize and prepare Motion for filing.	
2998.0001	02/12/2021	18	Α	1	470.00	0.60	282.00	Supplement motion for entry of a confidentiality agreement. Review and analyze correspondence	ARCH
								from opposing counsel. AA2484	

Client	Trans Date			Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.000									
2998.0001	02/15/2021	18	Α	1	470.00	0.20		Evaluate numerous emails from over the weekend.	ARCH
2998.0001	02/16/2021	18	Α	1	470.00	0.20		Evaluate and respond to correspondence.	ARCH
2998.0001	02/18/2021	18	Α	1	470.00	0.40		Telephone conference with Josef. Telephone conference with Eric regarding	ARCH
2998.0001	02/19/2021	18	Α	1	470.00	0.30		Review and analyze correspondence. Telephone conference.	ARCH
2998.0001	02/22/2021	18	Α	1	470.00	0.60	282.00	Supplement and finalize correspondence to Judge Sullivan. Evaluate and respond to correspondence regarding . Evaluate and respond to correspondence regarding	ARCH
2998.0001	02/22/2021	7	Α	1	340.00	0.10	34.00	Receipt and review of Joinder to Motion for Order Compelling Parties to Enter into Confidentiality Agreement.	ARCH
2998.0001	02/23/2021	18	Α	1	470.00	0.40	188.00	Review and analyze numerous correspondence, and respond to same. Supplement order.	ARCH
2998.0001	02/24/2021	18	Α	1	470.00	0.20	94.00	Telephone conference with opposing counsel. Review and analyze correspondence.	ARCH
2998.0001	03/01/2021	18	Α	1	470.00	0.40	188.00	Evaluate accounting. Review and analyze correspondence regarding	ARCH
2998.0001	03/02/2021	18	۸	1	470.00	0.10	47.00	Review and analyze correspondence.	ARCH
2998.0001	03/03/2021	18		1	470.00	0.50	235.00	Supplement and finalize notice of entry of order. Telephone conference with Eric Nelson. Telephone conference with Michelle Hauser.	ARCH
2998.0001	03/07/2021	18	Α	1	470.00	1.00	470.00	Evaluate opposition to motion for imposition of confidentiality agreement. Draft status report.	ARCH
2998.0001	03/08/2021	18	Α	1	470.00	1.30	611.00	Supplement and finalize status report. Review and analyze numerous correspondence regarding Telephone conference with Michelle and Eric.	ARCH
2998.0001	03/08/2021	7	Α	1	340.00	0.50	170.00	Review Opposition to Motion for Order Compelling Confidentiality Agreement and Countermotion. Review Status Report.	ARCH
2998.0001	03/09/2021	18	Α	1	470.00	1.20	564.00	Prepare for and participate in hearing. Telephone conference with Eric Nelson. Telephone conference with Michelle Hauser. Review and analyze correspondence from opposing counsel.	ARCH
2998.0001	03/09/2021	7	Α	1	340.00	1.60	544.00	Review prior correspondences regarding ; confer with Jeffrey P. Luszeck regarding Begin drafting Reply in Support of Motion for Confidentiality Agreement and Opposition to Countermotion for Fees and Costs.	ARCH
2998.0001	03/10/2021	18	Α	1	470.00	0.60	282.00	Review and analyze correspondence. Work on matter.	ARCH
2000.0001	03/11/2021	18	٨	1	470.00	0.40	188.00	Review and analyze numerous correspondence.	ARCH
2998.0001 2998.0001	03/11/2021	7		1	340.00	2.40	816.00	Continue reviewing and evaluating Opposition to Motion to Compel Confidentiality Agreement and Countermotion; research Nevada Rules of Civil Procedure regarding ; research case law regarding . Continue drafting Reply and Opposition to Countermotion.	ARCH
2998.0001	03/15/2021	18		1	470.00	0.30		Review and analyze numerous correspondence.	ARCH ARCH
2998.0001	03/16/2021	18		1	470.00	0.20	94,00 126,00	Review and analyze correspondence. Analyze and evaluate Order from January 26, 2021,	ARCH
2998.0001	03/16/2021	7	Α	1	340.00	0.40		Hearing.	
2998.0001	03/22/2021	18	Α	1	470.00	0.20		Review and analyze numerous correspondence between March 17 - 22.	ARCH
2998.0001	03/22/2021	7	Α	1	340.00	0.10		Receipt and review of emails from court setting hearing on discovery motions.	ARCH
2998.0001 2998.0001	03/23/2021 03/23/2021	18 7		1 1	470.00 340.00	0.10 0.10		Review and analyze correspondence. Confer with Jeffrey P. Luszeck regarding AA2485	ARCH ARCH
								AA2403	

Client	Trans Date	Tkpr	H Tcode/ P Task Code	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.00	U1 Nelson, Eri	C L.						
2998.0001	03/24/2021	18	A 1	470.00	2.80	1,316.00	Prepare for and travel to conference with Eric Nelson. Evaluate and respond to correspondence.	ARCH
2998.0001	03/24/2021	7	A 1	340.00	2.70	918.00	Prepare for and travel to and from meeting with Jeffrey P. Luszeck, client, and Michelle A. Hauser to discuss matter and proceeding with discovery and trial.	ARCH
2998.0001	03/25/2021	18	A 1	470.00	0.20	94.00	Evaluate and respond to correspondence.	ARCH
2998.0001	03/23/2021	18		470.00	0.10		Evaluate correspondence.	ARCH
2998.0001	03/28/2021	18		470.00	0.10		Evaluate correspondence.	ARCH
2998.0001	03/29/2021	7		340.00	0.20	68.00	Receipt and review emails between client and Michelle Hauser regarding	ARCH
2998.0001	03/29/2021	18	A 1	470.00	0.20	94.00	Evaluate numerous correspondence.	ARCH
2998.0001	03/31/2021	18		470.00	0.10	47.00	Telephone conference with Shawn King.	ARCH
2998.0001	04/01/2021	5		220.00		0.00	Review and respond to e-mails regarding. E-mail to Client. E-mail to Michelle Hauser, Esq.	ARCH
2998.0001	04/01/2021	18	A 1	470.00	0.20		Evaluate numerous correspondence.	ARCH
2998.0001	04/05/2021	18	A 1	470.00	0.70		Evaluate correspondence. Evaluate accountings and other pleadings.	ARCH
2998.0001	04/06/2021	18	A 1	470.00	1.90		Prepare for and participate in telephone conference. Evaluate accountings prepared by Lynita.	ARCH
2998.0001	04/06/2021	7		340.00	3.30		Review notes from Begin drafting Requests for Production of Documents to Lynita Nelson. Telephone communication with Michelle Hauser regarding Prepare for and attend conference call with Eric Nelson, Jeffrey Luszeck and Michelle Hauser to discus Telephone conference with Eric Nelson. Begin	ARCH
2998.0001	04/12/2021	18		470.00	0.70		preparing for upcoming hearing.	
2998.0001	04/13/2021	18 .	A 1	470.00	3.20	1,504.00	Prepare for and participate in hearing. Telephone conference with Michelle Hauser and Eric Nelson. Begin evaluating Lynita's voluminous document production.	ARCH
2998.0001	04/14/2021	18	A 1	470.00	0.40	188.00	Confer with Josh Hood regarding Begin evaluating recent disclosures.	ARCH
2998.0001	04/15/2021	18 .	A 1	470.00	0.10		Work on matter.	ARCH
2998.0001	04/16/2021	18 .	A 1	470.00	1.20	564.00	Confer with Josh Hood regarding Telephone conference with opposing counsel. Evaluate and respond to correspondence from same.	ARCH
2998.0001	04/16/2021	7 .	A 1	340.00	1.30		Confer with Jeffrey P. Luszeck regarding telephone conference with Jeffrey P. Luszeck and Michelle Hauser regarding telephone conference with Jeffrey P. Luszeck and opposing counsel regarding discovery and regarding Review and evaluate Order Imposing Joint Preliminary Injunction Pursuant to Writ of Mandamus. Review and evaluate Ex Parte Motion for Issuance of Joint Preliminary Injunction.	ARCH
2998.0001	04/18/2021	18 .		470.00	0.10		Evaluate correspondence from Eric.	ARCH
2998.0001	04/19/2021	7 .	A 1	340.00	2.00		Analyze and evaluate Decree of Divorce, filed on June 3, 2013; Order for Payment of Funds Pursuant AA2486 Thursday 02/09/202	ARCH

Date: 02/09/2023

Detail Fee Transaction File List Solomon Dwiggins Freer & Steadman, Ltd.

Trans H Tcode/ Hours

Client Date Tkpr P Task Code Rate to Bill Amount Ref #

Client ID 2998.0001 Nelson, Eric L.

to June 3, 2013 Decree of Divorce, filed June 19, 2013; Order Shortening Time and Motion for a Finding of Contempt, for Implementation of the Penalties of Contempt, for Fees and Costs, and for Other Related Relief and Order to Show Cause, both filed on July 18, 2013; Order Denying Countermotion to Stay Payments and Transfer Property Pending Appeal and/or Resolution of the Nevada Supreme Court for an Extraordinary Writ, filed on August 26, 2013; Order from September 4, 2013 Hearing Regarding Payment of Lindell Professional Plaza Income, filed September 25, 2013; Order from October 21, 2013 Hearing Regarding Transfer of Enjoined Funds from BNY Mellon to Bank of Nevada, and Further Injunction of Funds at Bank of Nevada, filed on November 15, 2013; Order Denying Motion to Disqualify Judge Frank P. Sullivan, filed on January 13, 2014; Order to Show Cause, filed on April 18, 2014; Order from March 31, 2014 Hearing Regarding Eric Nelson's Motion to Modify Visitation and Lynita Nelson's Countermotion for Order to Show Cause, filed May 9, 2014; Order Granting Motion to Substitute Parties Pursuant to NRCP 25(c); Order from March 31, 2014 Hearing Regarding Motion for Summary Judgment and Motion in Limine, filed on June 2, 2014; Order for Payment of Funds from Blocked Account, filed on June 4, 2014; Order for Payment of Larry L. Bertsch, CPA & Associates from Blocked Account, filed on June 4, 2014; Order Determining Disposition of Dynasty Development Management Inc., aka Wyoming Downs, filed on September 18, 2014; Order from July 22, 2013 Hearing on Lynita Nelson's Motion to Amend or Alter Judgment, for Declaratory and Related Relief, filed on September 18, 2014; Order Regarding Pebble Beach Residence, filed on September 18, 2014; Order Regarding Transfer of Property and Injunction; Order to Show Cause, filed on February 19, 2015; Order to Show Cause, filed on February 27, 2015; Order to Show Cause, filed on March 5, 2015; Order Shortening Time, filed on June 11, 2015; Order for Release on June 30, 2015, filed on June 26, 2015; Decision filed on April 19, 2015; Decision Affirming the Date of Tracing; Denying a Separate Blocked Account for the \$720,000; and Granting a Joint Preliminary Injunction for the Banone, LLC and Lindell Properties, filed on May 22, 2018; Decision, filed on October 16, 2018; Decision, filed on October 10, 2019; Decision and Order, filed October 27, 2020; Order Removing Larry Bertsch as Special Master and Requiring Eric Nelson, Lynita Nelson and the ELN Trust to Pay Larry Bertsch's Fees, filed on October 27, 2020; Order Requiring Lynita Nelson and the LSN Trust to Sell its 50% Interest in the Brian Head Property to the ELN Trust, filed October 27, 2020; Order from December 22, 2020 Hearing, filed on January 4, 2021; Order from January 26, 2021 Hearing, filed on March 3, 2021. 705.00 Evaluate all outstanding orders in preparation of determining case plan going forward. Evaluate other outstanding issues.

141.00 Evaluate and respond to correspondence.

94,00 Evaluate numerous correspondence.

47.00 Evaluate correspondence.

AA2487

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04/19/2021

04/20/2021

04/21/2021

04/22/2021

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18 A

18 A

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Detail Fee Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date	Tkpr	H Tcod P Task	e/ Code	Rate	Hours to Bill	Amount		Ref #
Client ID 2998.000 2998.0001	04/26/2021	18	A	1	470.00	0.20	94.00	Evaluate and respond to correspondence. Confer with Josh Hood regarding	ARCH
2998.0001	04/27/2021	7	А	1	340.00	2.50	850.00	Review and evaluate Motion for Temporary Support and to Establish Child Support Orders; Plaintiff's Opposition to Defendant's Request Regarding Alleged Child Support and Alimony Arrears; review and evaluate Decree of Divorce to identify provision regarding child support and alimony; review Nevada Supreme Court Opinion to Review and evaluate Lynita's Fourteenth Post Appeal Disclosures; receipt of emails from Jeffrey P. Luszeck and Michelle Hauser regarding Review Plaintiff's Authenticity Objection under NRCP 16.2 and/or NRCP 16.205.	ARCH
2998.0001	04/27/2021	18	A	1	470.00	0.40	188.00	Evaluate disclosures and numerous correspondence. Confer with Josh Hood regarding	ARCH
	04/28/2021	7 18		1 1	340.00 470.00	0.10 1.00		Telephone message to Dan Gerety regarding Continue to evaluate correspondence from Josef.	ARCH ARCH
2998.0001	04/29/2021	10	A	i	470.00	1.50		Telephone conference with Eric and Michelle.	
2998.0001	04/29/2021	7	A	1	340.00	0.40	136.00	Receipt of telephone message from Dan Gerety; return call and leave message to Dan Gerety. Telephone conference with Dan Gerety regarding	ARCH
2998.0001	04/30/2021	18	A	1	470.00	1.00		Begin to evaluate expert witness report.	ARCH
	05/03/2021	18	A	1	470.00	0.90	423.00	Evaluate and respond to numerous correspondence.	ARCH
2998.0001	05/04/2021	18	A	1	470.00	3.20	1,504.00	Continue to evaluate expert witness report. Telephone conference with Eric Nelson. Telephone conference with Michelle Hauser. Continue to review Lynita's expert witness report. Supplement pleading relating to child support and arrears.	ARCH
2998.0001	05/04/2021	7	Α	1	340.00	2.30	782.00	Analyze and evaluate Anthem Forensics Expert Witness Report, Report Date April 30, 2021.	ARCH
2998.0001	05/05/2021	18	A	1	470.00	2.60	1,222.00	Prepare for and participate in telephone conference with Michelle and Eric. Work on numerous discovery issues. Continue to evaluate expert witness report.	ARCH
2998.0001	05/05/2021	7	A	1	340.00	0.90		Confer with Jeffrey P. Luszeck regarding Confer with Jeffrey P. Luszeck regarding Begin drafting Requests for Production of Documents.	ARCH
2998.0001	05/06/2021	18	A	1	470.00	0.80	376.00	Supplement subpoenas duces tecum and requests for production. Confer with Josh Hood and Michelle Hauser regarding	ARCH
2998.0001	05/06/2021	7	A	1	340.00	3.00	1,020.00	Review Subpoenas Duces Tecum issued to Anthem Forensics and Melissa Attanasio; continue drafting Requests for Production of Documents. Email communications with Michelle Hauser regarding	ARCH
2998.0001	05/07/2021	18 .	A	1	470.00	0.80		Review and supplement subpoena duces tecum, requests for production and correspondence to Josef. Confer with Michelle and Josh regarding	ARCH
2998.0001	05/07/2021	7	A	1	340.00	1.30	442.00	Review draft response correspondence to opposing counsel regarding Review emails from Michelle Hauser regarding AA2488	ARCH

	Trans		H Tcode/		Hours			
Client	Date	<u> </u>	Task Code	Rate	to Bill	Amount		Ref #
Client ID 2998.00	01 Nelson, Eric	L,						
							confer with Jeffrey P. Luszeck regarding revise Requests for Production of Documents. Review finalized response letter to opposing counsel; review finalized Amended Subpoenas Duces Tecums.	
2998.0001 2998.0001	05/08/2021 05/10/2021	18 <i>A</i>		470.00 470.00	1.10 1.70		Continue to evaluate expert witness report. Continue to evaluate expert witness report from Anthem Forensics. Evaluate and respond to correspondence.	ARCH ARCH
2998.0001	05/10/2021	7 /	A 1	340.00	1.00	340.00	Review Order regarding prepare for and attend	ARCH
2998.0001	05/12/2021	18 /	A 1	470.00	1.50	705.00	call with Chris Wilcox and Jeffrey P. Luszeck. Prepare for and participate in telephone conference with Dan Gerety. Continue to analyze issues relating	ARCH
2998.0001	05/13/2021	18 /	A 1	470.00	1.40	658.00	Telephone conference with Michelle. Telephone conference with Eric. Evaluate and respond to correspondence from opposing counsel. Continue to work on response to motion to recalculate child support and alimony.	ARCH
2998.0001 2998.0001	05/14/2021 05/15/2021	18 <i>A</i>		470.00 470.00	0.20 0.80		Telephone conference with Michelle. Evaluate motion for protective order. Supplement response to arrear calculation.	ARCH ARCH
2998.0001	05/17/2021	18 A	A 1	470.00	1.30	611.00	Numerous telephone conferences with Michelle and Eric. Review and analyze numerous correspondence from same. Supplement and finalize response.	ARCH
2998.0001	05/17/2021	7 /	A 1	340.00	0.80	272.00	Receipt and review of Plaintiff's Brief Regarding receipt of emails between counsel regarding receipt of emails from Eric Nelson regarding Analyze and evaluate Objection to Plaintiff's Proposed Subpoenas Duces Tecum to Anthem Forensics and Melissa Attanasio and Motion for Protective Order and for Attorneys' Fees and Costs.	ARCH
2998.0001	05/18/2021	18 <i>A</i>	A 1	470.00	0.50	235.00	Telephone conference with Michelle. Evaluate and respond to correspondence. Work on outline for motion for summary judgment.	ARCH
2998.0001	05/19/2021	18 A	A 1	470.00	0.70	329.00	Confer with Josh Hood regarding . Analyze and respond to correspondence from Michelle.	ARCH
2998.0001	05/19/2021	7 <i>F</i>	A 1	340.00	0.70	238.00	Confer with Jeffrey P. Luszeck regarding	ARCH
2998.0001	05/20/2021	18 A	1	470.00	0.20	94.00	Confer with Josh Hood regarding	ARCH
2998.0001	05/20/2021	7 A	1	340.00	1.00	340.00	Review and evaluate Nevada Advanced Opinion regarding	ARCH
2998.0001	05/21/2021	7 A	1	340.00	0.90	306.00	Continue evaluating Advanced Opinion from Supreme Court. Begin evaluating Dan Gerety's summary of Anthem Forensics Expert Report to identify arguments to incorporate into Motion for Summary Judgment.	ARCH
2998.0001	05/23/2021	7 A	1	340.00	2.70		Continue evaluating Dan Gerety's summary of Lynita Nelson's expert report; review and evaluate Motion for Determination of Burden of Proof; Opposition thereto; Reply in Support of Motion; and Order regarding Continue evaluating Anthem Forensics Expert Report. Begin drafting outline for Motion for Summary Judgment.	ARCH

Hours H Tcode/ Trans Ref# Client Date **Task Code** Rate to Bill Amount Client ID 2998.0001 Nelson, Eric L. ARCH 94.00 Evaluate correspondence. Confer with Josh Hood 470.00 0.20 2998.0001 05/24/2021 18 A regarding ARCH 340.00 2.50 850.00 Confer with Jeffrey P. Luszeck regarding 2998.0001 7 A 1 05/24/2021 Email communication to Dan Gerety regarding . Continue analyzing Expert Report; continue drafting outline for Motion for Summary Judgment. Research Continue drafting outline for Motion for Summary Judgment; email to Jeffrey P. Luszeck regarding **ARCH** 34.00 Confer with Jeffrey P. Luszeck regarding 340.00 0.10 2998.0001 05/25/2021 1 ARCH 442.00 Confer with Jeffrey P. Luszeck regarding 340.00 1.30 1 2998.0001 05/26/2021 7 A Continue researching and evaluating case law regarding review and evaluate Opening Brief and Reply Brief to identify case law cited therein standing for the same proposition; continue drafting memorandum regarding correspondence from Fine, Carmine, Price, filed by opposing counsel, granting an extension to file an opposition to Lynita's Objection to Subpoena to Anthem Forensics. **ARCH** 0.40 188.00 Work on outline for motion for summary judgment. 470.00 2998.0001 05/26/2021 18 A 1 Evaluate correspondence from Michelle Hauser. ARCH 340.00 1.20 408.00 Continue evaluating caselaw regarding 7 A 2998.0001 05/27/2021 continue drafting memorandum regarding 658.00 Telephone conference with Eric, Michelle Hauser ARCH 470.00 1.40 18 A 2998.0001 06/01/2021 and opposing counsel. Review opposition to motion for protective order. ARCH 94.00 Evaluate and respond to correspondence. 0.20 18 A 1 470.00 2998.0001 06/02/2021 1,700.00 Review and evaluate completed memorandum from ARCH 340.00 5.00 7 A 1 2998.0001 06/02/2021 Dan Gerety regarding review Nevada Supreme Court opinion; review Order regarding review: review memorandum and outline for motion for summary judgement; continue reviewing case law regarding Continue drafting Motion for Summary Judgment, or Alternatively, Motion to Continue Deadline to File Rebuttal Expert Report and Continue Trial. Review and evaluate Opposition to Defendant's Objection to Plaintiff's Proposed Subpoena Duces Tecum to Anthem Forensics and Melissa Attanasio, and Motion for Protective Order and for Attorneys' Fees and Costs. ARCH 550.00 0.20 110.00 Research regarding 1 8 A 2998.0001 06/02/2021 1,175.00 Supplement motion for summary judgment. ARCH 18 A 470.00 2.50 2998.0001 06/03/2021 893.00 Continue to work on motion for summary judgment. ARCH 1.90 18 A 470.00 2998.0001 06/04/2021 1 ARCH 680.00 Review and evaluate Jeffrey P. Luszeck's revisions to 340.00 2.00 06/04/2021 7 A 1 2998.0001 Motion for Summary Judgment; confer with Jeffrey P. Luszeck regarding AA2490

Detail Fee Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd. Hours H Tcode/ Trans Ref# Amount Date Task Code Rate to Bill Client Client ID 2998.0001 Nelson, Eric L. Review Motions in Limine filed by Lynita Nelson regarding Research case law regarding Review Anthem Report. Begin drafting Motion to Strike portion of Motion for Summary Judgment. ARCH 141.00 Telephone conference with opposing counsel. 470.00 0.30 18 A 1 2998.0001 06/07/2021 Evaluate and respond to numerous correspondence. 850.00 Receipt of emails from Jeffrey P. Luszeck, Dan ARCH 340.00 2.50 06/08/2021 7 A 1 2998.0001 Gerety, and client. Continue evaluating Anthem Report; continue reviewing analysis provided by Dan Gerety; continue drafting Motion for Summary Judgment. Research Nevada statutory and case law regarding Opposition to Objection to Proposed Subpoenas and Motion for Protective Order; continue drafting Alternative Motion to Strike Expert Report and Motion to Continue Discovery and Trial Deadlines. ARCH 1,222.00 Continue to supplement motion for summary 2.60 470.00 2998.0001 06/14/2021 judgment. 170.00 Analyze and evaluate Defendant, Lynita A. Nelson's, ARCH 340.00 0.50 7 A 2998.0001 06/14/2021 Reply to Plaintiff's Opposition to Defendant's Objection to Plaintiff's Proposed Subpoena Duces Tecum to Anthem Forensics and Melisssa Attanasio, and Motion for Protective Order and for Attorneys' Fees and Costs. Review exhibits referenced in Reply. 893.00 Continue to supplement motion for summary ARCH 190 470.00 2998.0001 06/15/2021 18 A 1 judgment. ARCH 374.00 Review and revise Motion for Summary Judgment, 340.00 1.10 1 2998.0001 06/15/2021 7 A etc. to include citations to pleadings, orders, and statutory and case law. Confer with Jeffrey P. Luszeck regarding 235.00 Continue to supplement Motion for Summary ARCH 470.00 0.50 06/16/2021 18 A 2998.0001 Judgment. Confer with Josh Hood regarding Draft correspondence. ARCH 47.00 Review and analyze correspondence. 470.00 0.10 1 2998.0001 06/17/2021 18 A **ARCH** 170.00 Confer with Jeffrey P. Luszeck regarding 340.00 0.50 7 A 2998.0001 06/17/2021 1 Continue drafting Motion for Summary Judgment. Email to Jeffrey P. Luszeck and Michelle Hauser regarding 141.00 Review, analyze and respond to correspondence. ARCH 18 A 1 470.00 0.30 2998.0001 06/18/2021 Voicemail for Michelle. ARCH 0.60 204.00 Analyze and evaluate Defendant's Correction and 340.00 7 A 1 2998.0001 06/18/2021 Update to Notice of Filing and Filing of Arrearage Calculation Summary for Child Support, and reply in Support of Same; review exhibits thereto. Review Plaintiff's Amended Brief Regarding Child Support. Email to opposing counsel regarding ARCH 0.20 68.00 Review Motion for Summary Judgment and exhibits 340.00 1 2998.0001 06/21/2021 to prepare for filing. 141.00 Review, analyze and respond to correspondence. ARCH 470.00 0.30 2998.0001 06/21/2021 18 A 1 ARCH 204.00 Email to Michelle Hauser regarding 7 A 340.00 0.60 1 2998.0001 06/24/2021 . Follow up telephone message to Michelle Judge Sullivan's judicial executive assistant regarding I Email to Jeffrey P. Luszeck and Michelle Hauser regarding

AA2491

Detail Fee Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date			Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.000	1 Nelson, Eric	: L.						en e	ARCH
2998.0001	06/24/2021	18	Α	1	470.00	0.50	235.00	Telephone conference with Michelle. Evaluate documents for disclosure.	ANCH
2998.0001 2998.0001	06/25/2021 06/29/2021	18 18		1	470.00 470.00	0.10 1.70		Review, analyze and respond to correspondence. Prepare for and participate in telephone conference with Michelle Hauser, Michael Carman and opposing counsel. Review, analyze and respond to numerous correspondence. Work on issues relating to expert	ARCH ARCH
2998.0001	06/29/2021	7	Α	1	340.00	1.00	340.00	witness retention. Confer with Josh Hood regarding Prepare for and attend call with Jeffrey P. Luszeck, Michelle Hauser and Mike Carman to strategize regarding attend call with all counsel regarding	ARCH
2998.0001	06/30/2021	18	Α	1	470.00	0.30	141.00	Review and analyze correspondence. Review subpoena duces tecum to Larry Bertsch.	ARCH
2998.0001	07/01/2021	18	Α	1	470.00	0.50		Review, analyze and respond to numerous correspondence.	ARCH
2998.0001	07/01/2021	7	Α	1	340.00	1.50	510.00	Review Amended Scheduling Order; review Motion for Summary Judgment. Begin drafting Ex Parte Application for Order Shortening Time to hear Motion for Summary Judgment.	ARCH
2998.0001	07/02/2021	18	Α	1	470.00	0.50	235.00	Review, analyze and respond to numerous correspondence. Continue to review responses to requests for production of documents. Confer with Sherry J. Keast and Josh Hood regarding	ARCH
2998.0001	07/02/2021	5	Α	1	220.00	2.00	440.00	Work on discovery. Confer with Jeffrey P. Luszeck and Joshua M. Hood regarding . Finalize Request for Production responses and serve the same. E-mail to Josef Karacsonyi. Begin redacting tax returns.	ARCH
2998.0001	07/02/2021	7	Α	1	340.00	1.40	476.00	Receipt of emails from Michelle Hauser regarding : review Opposition to Subpoenas to identify objections raised by Lynita; review Subpoena to Larry Bertsch. Draft response email to Michelle Hauser regarding Review and evaluate draft Plaintiff's Responses to Defendant's First Post Appeal Request for Production of Documents. Draft response email to Michelle Hauser regarding Confer with Sherry J. Keast regarding Email communications with Michelle Hauser regarding Telephone communication with Michelle Hauser regarding confer with Sherry J. Keast regarding confer with Sherry J. Keast regarding confer with Sherry J. Keast regarding	ARCH
2998.0001	07/04/2021	18	Α	1	470.00	0.40		Begin evaluating Lynita's responses to requests for production of documents.	ARCH
2998.0001	07/06/2021	5		1	220.00	1.00		Begin redacting tax returns.	ARCH
2998.0001	07/06/2021	18	Α	1	470.00	0.10		Review and analyze correspondence.	ARCH
2998.0001	07/07/2021	5		1	220.00	0.50		Review tax return redactions. E-mail to Josef Karacsonyi.	ARCH ARCH
2998.0001 2998.0001	07/07/2021 07/07/2021	5 18		1 1	220.00 470.00	0.90		Continue redacting tax returns. Review, analyze and respond to correspondence. Work on issues relating to expert retention. Begin	ARCH
2998.0001	07/08/2021	18	Α	1	470.00	1.00	470.00	to evaluate responses to requests for production of documents. Prepare for and participate in conference call with John Wightman. Review and analyze correspondence from same. Review and analyze correspondence from Michelle regarding	ARCH
								Confer with Josh Hood regarding AA2492	

				_					
Client	Trans Date		H Tcode P Task	•	Rate	Hours to Bill	Amount		Ref#
Client ID 2998.000		 : L.		_					
				_		4.00	240.00	responses.	ARCH
2998.0001	07/08/2021	7	A 1	3	340.00	1.00	340.00	Begin analyzing and evaluate Lynita's Responses to Requests for Production of Documents and	ARCH
								documents disclosed therewith.	
2998.0001	07/09/2021	7	A 1	3	340.00	0.60	204.00	Continue evaluating documents disclosed by Lynita	ARCH
	, ,							Nelson in response to Requests for Production of	
						0.00	202.00	Documents. Telephone conference with Eric Nelson. Review,	ARCH
2998.0001	07/12/2021	18	A 1	2	170.00	0.60	282.00	analyze and respond to correspondence. Work on	ARCH
								issues relating to expert retention.	
2998.0001	07/13/2021	18	A 1	2	170.00	0.20		Review and analyze correspondence.	ARCH
2998.0001	07/14/2021	18	A 1	4	170.00	0.90	423.00	Telephone conference with Michelle Hauser. Begin	ARCH
								to evaluate opposition to motion for summary judgment. Review, analyze and respond to	
								correspondence from Doug Winters.	
2998.0001	07/15/2021	18	A 1	4	170.00	1.40	658.00	Begin to review opposition to motion to dismiss.	ARCH
2990.0001	07/13/2021		,		., 0.00			Review correspondence.	
2998.0001	07/15/2021	7	A 1	3	340.00	0.70	238.00	Begin analyzing and evaluating Opposition to	ARCH
								Motion for Summary Judgment, or Alternatively,	
								Motion to Strike and/or Motion to Extend Deadline to File Rebuttal Expert Report and to Continue Trial	
								(First Post-Appeal Request) and Countermotion to	
								Compel Production of Documents and for Attorneys'	
								Fees and Costs.	
2998.0001	07/16/2021	7	A 1	3	340.00	0.30	102.00	Continue analyzing and evaluating Lynita Nelson's	ARCH
					70.00	0.50	225.00	Opposition to Motion for Summary Judgment, etc. Review, analyze and respond to numerous	ARCH
2998.0001	07/19/2021	18	A 1	2	170.00	0.50	235.00	correspondence from Doug Winters, Michelle and	AICH
								Eric.	
2998.0001	07/20/2021	18	A 1	4	170.00	1.30	611.00	Review, analyze and respond to correspondence.	ARCH
								Work on issues relating to deadlines. Confer with	
								Josh Hood regarding	
	07/20/2024	7		-	240.00	2.10	714.00	Receipt and review of numerous emails with	ARCH
2998.0001	07/20/2021	7	A 1		340.00	2.10	7 14.00	Michelle Hauser regarding Email to	7111011
								opposing counsel regarding	
								. Review and evaluate Lynita Nelson's First	
								Supplemental responses to Matt Klabacka's Request for Production of Documents. Email to opposing	
								counsel regarding documents disclosed in Lynita	
								Nelson's Supplemental Responses to Requests for	
								Production of Documents. Confer with Jeffrey P	
								Luszeck regarding	
		4.0			170.00	0.40	100.00	Review and analyze multiple correspondence.	ARCH
2998.0001	07/21/2021	18	A 1	4	170.00	0.40	100.00	Evaluate agenda for upcoming conference call.	ARCH
								Evaluate issues relating to motion to disqualify.	
2998.0001	07/21/2021	7	A 1	3	340.00	1.50	510.00	Review Motion for Summary Judgment and	ARCH
								Opposition thereto; research case law cited in	
								Opposition; review Supreme Court remand order and order regarding	
								orders. Being drafting memorandum regarding	
								Begin drafting Reply in Support of Motion for	
								Summary Judgment.	
2998.0001	07/22/2021	18			170.00	0.30		Review and analyze correspondence.	ARCH
2998.0001	07/22/2021	7	A 1	3	340.00	3.00		Continue evaluating pleadings and orders from	ARCH
								court, as well as Lynita's Expert Report. Continue drafting Reply in Support of Motion for Summary	
								Judgment.	
2998.0001	07/23/2021	18	A 1	4	70.00	2.50	1,175.00	Prepare for and participate in telephone conference	ARCH
	. =	- '						with Michelle and Michael. Supplement reply to	
								opposition to motion for summary judgment.	
								Evaluate and respond to correspondence from Eric AA2493	

Detail Fee Transaction File List

Solomon Dwiggins Freer & Steadman, Ltd.

Client	Trans Date	Tkpr P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 2998.00	01 Nelson, Eri	c L.					Nelson and Doug Winters.	
2998.0001	07/23/2021	7 A	1	340.00	1.60	544.00	Confer with Jeffrey P. Luszeck regarding prepare for and attend meeting with Jeffrey P. Luszeck, Michelle Hauser, and Mike Carman regarding	ARCH
				470.00	0.20	04.00	Continue drafting Reply in Support of Motion for Summary Judgment. Review and analyze correspondence.	ARCH
2998.0001	07/24/2021	18 A		470.00 470.00	0.20 2.40		Evaluate and respond to numerous correspondence.	ARCH
2998.0001	07/26/2021	18 A	'	470.00	2.40		Work on issues relating to expert report. Supplement reply to opposition to motion for summary judgment.	
2998.0001	07/26/2021	7 A	. 1	340.00	3.60	1,224.00	Continue evaluating pleadings on file; review of notes and emails from Jeffrey P. Luszeck regarding continue drafting Reply in Support of Motion for Summary Judgment.	ARCH
2998.0001	07/27/2021	18 A	1	470.00	3.00	1,410.00	Continue to draft reply to opposition to motion for summary judgment. Telephone conference with Michelle Hauser.	ARCH
2998.0001	07/28/2021	7 A	. 1	340.00	1,20	408.00	Review and revise draft of Reply in Support of Motion for Summary Judgment. Confer with Jeffrey P. Luszeck regarding	ARCH
2998.0001	07/28/2021	18 A	. 1	470.00	0.50	235.00	Evaluate numerous correspondence. Evaluate issues relating to reply to opposition to Motion for Summary Judgment.	ARCH
2998.0001	08/01/2021	18 A	1	470.00	0.10		Evaluate numerous correspondence.	ARCH ARCH
2998.0001	08/02/2021	5 A	. 1	220.00	0.70		Confer with Jeffrey P. Luszeck regarding Revise Expert Disclosure. E-mail to Michelle Hauser. Confer with Jeffrey P. Luszeck. Further revisions to Expert Disclosure. Telephone call with Ms. Hauser. Final revisions to Expert Disclosure. Serve the same.	
2998.0001	08/02/2021	5 A	. 1	220.00	0.50	110.00	Confer with Jeffrey P. Luszeck. Prepare Docket Report relating to filings since remand, 06/27/2017. E-mail to Jeffrey P. Luszeck.	ARCH
2998.0001	08/02/2021	18 A	1	470.00	0.60	282.00	Review and analyze multiple correspondence.	ARCH
2998.0001	08/02/2021	7 A	. 1	340.00	0.20	68.00	Supplement expert witness disclosure. Review of emails between counsel regarding : confer with Jeffrey P. Luszeck regarding	ARCH
2998.0001	08/03/2021	18 A	1	470.00	0.20	94.00	Review and analyze multiple correspondence. Evaluate witness disclosure.	ARCH
2998.0001	08/04/2021	5 A	. 1	220.00	0.20	44.00	Review e-mail from and confer with Jeffrey P. Luszeck. Schedule conference call with Michelle Hauser and Michael Carman	ARCH
2998.0001	08/04/2021	18 A	1	470.00	5.70	2,679.00	Prepare for and participate in conference call with Michelle and Michael. Prepare for and participate in hearing on motion for summary judgment. Evaluate and respond to correspondence regarding	ARCH
2998.0001	08/04/2021	7 A	1	340.00	2.50	850.00	Confer with Jeffrey P. Luszeck regarding , review Motion, Opposition, and Reply thereto. Begin drafting outline for hearing. Email communications with Michelle Hauser regarding . Confer with Jeffrey P. Luszeck regarding	ARCH
							for and attend hearing on Motion for Summary Judgment with Jeffrey P. Luszeck.	
2998.0001	08/05/2021	18 A	1	470.00	0.20	94.00	Evaluate and begin respond to correspondence. AA2494	ARCH

Client 10 2998 0001 Notice, pick	Client	Trans Date		H Tcode/ P Task Code	Rate	Hours to Bill	Amount		Ref #
2998.0001 08/07/2021 18 A 470.00 1.90 646.00 0.00	Client ID 2998.000	1 Nelson, Eric	L.						
2998.0001 08/17/2021 7 A 1 340.00 1.90 646.00 Email communications to accounsel and expert ARCH regarding an evaluate Motion to Compel Disclosure Regarding Disposition of Proceeds of Russell Socious Regarding Disposition of Proceeds of Russell Regarding of Proceeds of Russell Regarding of Regarding Disposition of Proceeds of Russell Regarding of Regarding Disposition of Proceeds of Russell Regarding of Regarding Disposition of Proceeds of Russell Regarding Disposition of Proceeds of Russell Regarding Disposition Proceeds of Russell Regarding Disposition D				A 1	470.00	0.20			
## Page 2001 08/13/2021 18 A 1 470.00 0.40 186.00 Confer with booth food regarding Disposition to Market Plant of Compel Disclosure of Plant of Compel Disclosure of Compel Discl	2998.0001	08/07/2021	18	A 1	470.00				
2998.0001 08/13/2021 18 A 1 470.00 0.70 329.00 Departed motion to compel disclosure regarding Review and analyze correspondence. Work on issues relating to expert retention to compel the standard analyze correspondence. Work on issues relating to expert retention to compel the standard and analyze correspondence. Work on issues relating to expert retention to compel the standard and analyze correspondence. Work on issues relating to expert retention to compel the standard and analyze correspondence. ARCH with Ends (Neston Suser stellar) to control the standard and and the standard and the standa	2998.0001							regarding	
2998.0001	2998.0001								· ·
With Fire Netson. Work on issues relating to outstanding motions. ARCH	2998.0001	08/09/2021	18 /	A 1	470.00	0.70	329.00	. Review and analyze correspondence. Work on issues relating to expert	
2998.0001	2998.0001	08/10/2021	18 /	A 1	470.00	0.40	188.00	with Eric Nelson. Work on issues relating to	ARCH
Compel Disclosure, to Add Party, and to Freeze Assets to discuss any guments in opposition threeto and arguments in support of Lynita's return of funds to click Trust. 2998.0001 08/13/2021 7 A 1 340.00 0.70 238.00 Review and evaluate Post Appeal orders to identify Review orders regarding 2998.0001 08/13/2021 7 A 1 340.00 1.20 408.00 Review and evaluate Post Appeal orders to identify Review orders regarding 2998.0001 08/13/2021 7 A 1 340.00 1.20 408.00 Review and evaluate Post Appeal orders to identify Review Orders regarding 2998.0001 08/13/2021 7 A 1 340.00 1.20 408.00 Review and evaluate Post Appeal orders to identify Review Post Appeal Order to identify Review Orders regarding Review Orders regarding ARCH With Institute Post Appeal orders to identify Review Post Appeal Order to identify Review Post Appeal Order to identify Review Orders regarding ARCH With Institute Post Appeal Order to identify Review Post Appeal Order to identify Review Post Appeal Order to identify Review Orders regarding Review Orders regarding Review Orders regarding Review Post Appeal Order to identify Review Post Appeal Order to identify Review Orders regarding Review Orders	2998.0001	08/11/2021	18 /	4 1	470.00	0.40		Confer with Josh Hood regarding	
2998.0001 08/13/2021 7 A 1 340.00 0.70 238.00 Review and evaluate Post Appeal orders to identify memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding Memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding ARCH Visited Party Research NRCP 16.2(d) and (f) regarding ARCH Visited Party Research NRCP 16.2(d) and (f) regarding ARCH Visited Party Research NRCP 16.2(d) and Review Research NRCP 16.2(d) ARCH Visited Party Research NRCP 16.2(d) ARCH Visited	2998.0001	08/11/2021	7 ,	A 1	340.00	0.50		Compel Disclosure, to Add Party, and to Freeze Assets to discuss arguments in opposition thereto and arguments in support of Lynita's return of funds to ELN Trust.	
provisions regarding ic; review Post Appeal Order to identify Review orders regarding Begin drafting memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding ARCH 2998.0001 08/13/2021 7 A 1 340.00 1.20 408.00 Review and evaluate Post Appeal orders to identify Review orders regarding Begin drafting memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding Begin drafting memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding 2998.0001 08/16/2021 18 A 1 470.00 0.40 188.00 Review, analyze and respond to correspondence. ARCH Confer with Josh Hood regarding ARCH Proper for, travel to and attend meeting with Doug ARCH ARCH ARCH and a difference of the provisions regarding and respond to correspondence. ARCH	2998.0001	08/13/2021	18 /	A 1	470.00			correspondence.	
Page 2998.0001 08/16/2021 18 A 1 470.00 0.40 188.00 Review, analyze and respond to correspondence. 2998.0001 08/18/2021 18 A 1 470.00 2.00 940.00 Prepare for, travel to and attend meeting with Doug ARCH Winters. Evaluate and respond to correspondence.								provisions regarding ic; review Post Appeal Order to identify Review orders regarding Begin drafting memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add Party. Research NRCP 16.2(d) and (f) regarding Review and evaluate Post Appeal orders to identify	
Confer with Josh Hood regarding 2998.0001 08/18/2021 18 A 1 470.00 2.00 940.00 Prepare for, travel to and attend meeting with Doug ARCH Winters. Evaluate and respond to correspondence								Review Post Appear Order to identify Review orders regarding Begin drafting memorandum/outline for Opposition to Motion to Compel Information and Documents and to Add	
Winters. Evaluate and respond to correspondence	2998.0001	08/16/2021	18 🗚	A 1	470.00	0.40	188.00		ARCH
	2998.0001	08/18/2021	18 #	A 1	470.00	2.00		Winters. Evaluate and respond to correspondence	ARCH

Detail Fee Transaction File List

Date: 02/09/2023 Solomon Dwiggins Freer & Steadman, Ltd. Hours H Tcode/ **Trans** Ref# Tkpr P Task Code Rate to Bill Amount Client Date Client ID 2998.0001 Nelson, Eric L. from opposing counsel. Confer with Michelle regarding ____ 141.00 Review and analyze numerous correspondence. ARCH 0.30 470.00 1 08/19/2021 18 A 2998.0001 22.00 Review Jeffrey P. Luszeck email regarding ARCH 1 220.00 0.10 5 A 08/19/2021 2998.0001 658.00 Prepare for and participate in telephone conference ARCH 470.00 1.40 18 A 1 2998.0001 08/20/2021 with Michelle. Outline opposition to motion to ARCH 374.00 Prepare for and attend conference call with Jeffrey P. 1.10 340.00 2998.0001 08/20/2021 7 A 1 Luszeck, Michelle Hauser, and Mike Carman regarding 94.00 Review and analyze numerous correspondence. ARCH 470.00 0.20 1 08/24/2021 18 A 2998.0001 Confer with Josh Hood regarding ARCH 680.00 Continue reviewing Post-Appeal Orders to identify 2.00 1 340.00 2998.0001 08/24/2021 7 A findings and orders regarding ; review April, 2021 Joint Preliminary Injunction; research NRCP 16.2; research EDCR 5.518 and 1.90; continue reviewing Motion to Compel, Add Parties, etc. Continue drafting Opposition to Motion. Email communications with Michelle Hauser regarding **ARCH** 44.00 Review and respond to Jeffrey P. Luszeck email (x2). 220.00 0.20 1 2998.0001 08/25/2021 5 A Email to Douglas Winters regarding ARCH 1,504.00 Continue to draft and supplement opposition to 470.00 3.20 18 A 08/25/2021 2998.0001 motion to compel. Review and analyze correspondence. ARCH 102.00 Confer with Jeffrey P. Luszeck regarding 0.30340.00 7 A 2998.0001 08/25/2021 to Compel, to Add parties, etc. and reviewing orders to identify Judge Sullivan's admissions that he incorrectly ordered certain interests in property. Email to opposing counsel regarding . Receipt of response email from opposing counsel regarding **ARCH** 1,034.00 Continue to supplement opposition to motion to 2.20 470.00 2998.0001 08/26/2021 18 A compel. ARCH 470.00 Continue to supplement motion to compel. Draft 1.00 470.00 08/27/2021 18 A 2998.0001 correspondence to Michelle and Mike regarding 238.00 Begin reviewing and evaluating draft of Opposition ARCH 340.00 0.70 1 08/30/2021 7 A 2998.0001 to Motion to Compel, Add Parties, etc. Begin reviewing transcripts to identify rulings by Judge Sullivan in support of arguments contained in Opposition. Begin revising Opposition to incorporate rulings by Judge Sullivan. ARCH 141.00 Confer with Josh Hood regarding 0.30 470.00 1 2998.0001 08/31/2021 18 A Continue to supplement opposition. 510.00 Continue reviewing Opposition to Motion to ARCH 7 A 1 340.00 1.50 08/31/2021 2998.0001 Compel; continue analyzing and evaluating transcripts and hearing videos to identify relevant findings and rulings by Judge Sullivan related to Brian Head property, Russell Road, the Joint Preliminary Injunction. Continue revising Opposition to incorporate findings by Judge Sullivan. Confer with Jeffrey P. Luszeck regarding and!

2.40

470.00

1

18 A

AA2496

1,128.00 Continue to supplement opposition to motion to

ARCH

2998.0001

09/01/2021

	Trans		H Tcode/		Hours			
Client	Date		P Task Co		to Bill	Amount		Ref #
Client ID 2998.00	01 Nelson, Eric	. L.						
							compel.	ARCH
2998.0001	09/01/2021	7 .	A 1	340.00	3.00	1,020.00	Continue analyzing and evaluating hearing videos	ARCH
							and transcripts to identify	
							Telephone communication with Michelle	
							Hauser's office regarding Confer with	
							Jeffrey P. Luszeck regarding continue	
							revising the same. Send draft or Opposition to	
							Michelle Hauser, Mike Carman, and Eric Nelson.	
2998,0001	09/02/2021	18	A 1	470.00	0.50	235.00	Supplement opposition. Telephone conference with	ARCH
2996.0001	09/02/2021	10	^ '	470.00	0.50		Michelle Hauser regarding	
2998.0001	09/02/2021	7	A 1	340.00	0.40	136.00	Review, revise, and finalize Opposition to Motion to	ARCH
2550.0001	03,02,2021	,					Compel, Add Parties, etc.	
2998.0001	09/04/2021	18	A 1	470.00	0.20	94.00	Evaluate substantive correspondence from opposing	ARCH
2550.0001	05,0 1,202						counsel.	
2998.0001	09/05/2021	18	A 1	470.00	0.10		Evaluate correspondence from Eric.	ARCH
2998.0001	09/06/2021	18		470.00	0.10	47.00	Review and analyze correspondence from Eric.	ARCH
2998.0001	09/07/2021	18	A 1	470.00	0.90	423.00	Review and analyze numerous correspondence.	ARCH
							Work on issues relating to expert witness retention.	
							Plan issues to discuss with co-counsel.	
2998.0001	09/09/2021	18	A 1	470.00	3.80	1,786.00	Prepare for, travel to and attend conference with	ARCH
							Michelle and Mike. Begin drafting correspondence	
							to Josef.	A D C L
2998.0001	09/13/2021	18	A 1	470.00	0.70	329.00	Review, analyze and respond to numerous	ARCH
							correspondence. Telephone conferences.	ADCH
2998.0001	09/14/2021	18	A 1	470.00	0.70	329.00	Review, analyze and respond to numerous	ARCH
							correspondence. Telephone conferences.	A DCL
2998.0001	09/15/2021	18	A 1	470.00	0.50	235.00	Review and analyze numerous correspondence.	ARCH
							Telephone conference with Eric Nelson. Telephone	
					0.50	202.00	conference with Michelle Hauser.	ARCH
2998.0001	09/16/2021	18	A 1	470.00	0.60	282.00	Review, analyze and respond to numerous	ARCH
					0.00	04.00	correspondence.	ARCH
2998.0001	09/17/2021	18		470.00	0.20		Review and analyze numerous correspondence.	ARCH
2998.0001	09/20/2021	18		470.00	0.10		Evaluate filed pleading. Review and analyze numerous correspondence.	ARCH
2998.0001	09/22/2021	18		470.00	0.20		Evaluate correspondence from Lynita.	ARCH
2998.0001	09/26/2021	18		470.00 470.00	0.20		Evaluate correspondence.	ARCH
2998.0001	09/27/2021	18		470.00	0.10		Review, analyze and respond to numerous	ARCH
2998.0001	09/28/2021	18	A I	470.00	0.20	34.00	correspondence.	
2000 0001	00/20/2021	18	Δ 1	470.00	1.90	893.00	Draft substantive correspondence to Eric regarding	ARCH
2998.0001	09/29/2021	10	Α Ι	470.00	1.50	033.00		
							. Conduct	
							substantive analysis of file regarding	
2998.0001	09/30/2021	18	A 1	470.00	0.80	376.00	Review, analyze and respond to numerous	ARCH
2930.0001	03/30/2021	,,,					correspondence. Telephone conference with Eric.	
							Telephone conference with Michelle Hauser.	
2998.0001	09/30/2021	7	A 1	340.00	0.10	34.00	Receipt and review of email from opposing counsel	ARCH
2550.0001	03,30,20-	·					requesting one day continuance to file reply in	
							support of motion to compel.	
2998.0001	10/01/2021	18	A 1	470.00	0.30	141.00	Strategize regarding Review	ARCH
							and analyze numerous correspondence. Telephone	
							conference with Michelle Hauser.	
2998.0001	10/04/2021	18	A 1	470.00	0.10		Review and analyze correspondence.	ARCH
2998.0001	10/04/2021	18	A 1	470.00	0.10	47.00	Review and analyze correspondence.	ARCH
2998.0001	10/12/2021	18	A 1	470.00	1.00	470.00	Evaluate Judge Sullivan's "Decision." Prepare for	ARCH
							hearing on motion to compel.	ABCU
2998.0001	10/12/2021	7	A 1	340.00	0.40	136.00	Review and evaluate Decision from court regarding	ARCH
							Email to Jeffrey P.	
				2			Luszeck regarding	ARCH
2998.0001	10/13/2021	18	A 1	470.00	0.90	423.00	Review, analyze and respond to numerous	ANCH
							correspondence. Telephone conference with Mike	
					0.00	200.00	and Michelle. Receipt of email from client regarding Decision and	ARCH
2998.0001	10/13/2021	7	A 1	340.00	0.90	300.00	AA2497	AINGIT
ATC							Thursday 02/09/202	3 10:35 am

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Detail Fee Transaction File List Solomon Dwiggins Freer & Steadman, Ltd.

Hours H Tcode/ Trans Ref# to Bill Amount Client Date Tkpr P **Task Code** Rate Client ID 2998.0001 Nelson, Eric L. Order on Motion for Summary Judgment. Prepare for and attend conference call with Jeff Luszeck, Mike Carman, and Michelle Hauser. ARCH 94.00 Review, analyze and respond to numerous 10/14/2021 18 A 470.00 0.20 2998.0001 correspondence. 188.00 Review, analyze and respond to numerous ARCH 0.40 1 470.00 2998.0001 10/18/2021 18 A correspondence. ARCH 102.00 Confer with Jeffrey P. Luszeck regarding 340.00 0.30 2998.0001 10/18/2021 7 A 1 ARCH 94.00 Review, analyze and respond to numerous 470.00 0.20 2998.0001 10/19/2021 18 A 1 correspondence. 850.00 Review Motion for Summary Judgment, Opposition ARCH 7 A 1 340.00 2.50 2998.0001 10/19/2021 thereto, Reply in Support of Motion for Summary Judgment, and Decision and Order regarding Begin drafting Motion for Clarification regarding 564.00 Review, analyze and respond to correspondence. ARCH 1.20 18 A 1 470.00 2998.0001 10/20/2021 Begin to review and analyze motion for clarification. **ARCH** 816.00 Continue evaluating Motion for Summary Judgment 2998.0001 10/20/2021 340.00 2.40 and responsive pleadings; evaluate Expert Report; evaluate Answering and Reply Brief to identify arguments and evidence related to Russell Road. Confer with Jeffrey P. Luszeck regarding ; continue drafting the same. 1,034.00 Review and analyze correspondence. Conduct legal ARCH 2.20 470.00 2998.0001 10/21/2021 18 A research. Supplement motion for clarification. ARCH 102.00 Research Nevada Rules of Civil Procedure and case 10/21/2021 340.00 0.30 2998.0001 law regarding Draft email to Jeffrey P. Luszeck regarding ARCH 0.40 136.00 Confer with Jeffrey P. Luszeck regarding 340.00 2998.0001 10/22/2021 7 A review and evaluate Motion for Clarification as revised by Jeffrey P. Luszeck. **ARCH** 2,350.00 Prepare for and attend hearing on motion to 470.00 5.00 2998.0001 10/25/2021 18 A compel. Review and analyze numerous correspondence to/from Mike and Michelle and Josef. Telephone conference with client. Telephone conference with Mike and Michelle. ARCH 340.00 1.00 340.00 Confer with Jeffrey P. Luszeck regarding 7 A 1 2998.0001 10/25/2021 review Reply in Support of Motion to Compel and review appellate decisions cited therein; email Jeffrey P. Luszeck regarding Attend hearing on Motion to Compel. 611.00 Review and analyze correspondence. Review file in **ARCH** 470.00 1.30 18 A 1 2998.0001 10/26/2021 preparation of depositions and to identify transactions identified in Motion for Summary Judgment and expert witness report. ARCH 0.00 Confer with Jeffrey P. Luszeck. 220.00 2998.0001 10/26/2021 5 A 1 170.00 Receipt and review of letter from Michelle Hauser to ARCH 340.00 0.50 7 A 2998.0001 10/26/2021 opposing counsel regarding . Confer with Jeffrey P. Luszeck regarding Draft First Set of Post-Appea Interrogatories to Lynita Sue Nelson. 846.00 Review and analyze motion for clarification. Begin **ARCH** 470.00 1.80 10/27/2021 18 A 2998.0001 outlining opposition to same. Review and analyze numerous correspondence. Confer with Josh Hood regarding ARCH 396.00 Begin review of file with respect to Harbor Hills 220.00 1.80 2998.0001 10/27/2021 1 property. Confer with Jeffrey P. Luszeck. 1,292.00 Begin analyzing and evaluating Lynita's Motion to ARCH 340.00 3.80 7 A 1 2998.0001 10/27/2021 AA2498

Client	Trans Date	Tkpr P	Tcode/ Task Code	Rate	Hours to Bill	Amount		Ref #
Client ID 2998.000	1 Nelson, Eric	L.					Course Clarify Alter or Amond and/or Parancidar	
							Correct, Clarify, Alter or Amend, and/or Reconsider Decision on Motion for Summary Judgment. Review and evaluate prior Decisions from Judge Sullivan and opinions from Supreme Court. Draft memorandum and notes in support of opposition to Lynita's Motion. Confer with Jeffrey P. Luszeck regarding drafting opposition to Lynita's Motion to Correct, Clarify, etc. Decision.	
2998.0001	10/28/2021	18 A	1	470.00	1.50	705.00	Continue to evaluate issues raised in motion for clarification and work on issues relating to expert report and trial.	ARCH
2998.0001	10/28/2021	5 A	1	220.00	1.80	396.00	Continue reviewing file with respect	ARCH
2998.0001	10/30/2021	18 A	1	470.00	1.60		Continue to review file to identify documents relating to transactions identified in report of Anthem Forensics.	ARCH
2998.0001	11/01/2021	18 A	1	470.00	1.20	564.00	Continue to evaluate documents for use in deposition and rebuttal expert report. Telephone conference with Doug Winter.	ARCH
2998.0001	11/02/2021	18 A	1	470.00	0.80	376.00	Review, analyze and provide substantive response to Eric's November 1 email. Review, analyze and respond to additional communications.	ARCH
2998.0001	11/03/2021	18 A	1	470.00	1.20	564.00	Review, analyze and respond to numerous correspondence. Telephone conference with Michelle. Supplement motion to extend discovery deadlines.	ARCH
2998.0001	11/03/2021	5 A	1	220.00	0.80	176.00	Confer with Jeffrey P. Luszeck. Begin isolating property documents.	ARCH
2998.0001	11/03/2021	7 A	1	340.00	2.90	986.00	Review Motion to Amend or Modify Order filed by Lynita; review notes from conference with Jeffrey P. Luszeck regarding	ARCH
2998.0001	11/04/2021	18 A	1	470.00	0.40	188.00	Telephone conference with Michelle Hauser. Review, analyze and respond to correspondence from same. Review motion to extend rebuttal discovery deadline.	ARCH
2998.0001	11/05/2021	18 A	1	470.00	0.60	282.00	Review, analyze and respond to correspondence. Confer with Josh Hood regarding Work on issues relating	ARCH
2998.0001	11/05/2021	5 A	1	220.00	2.20	484.00	Continue isolating property documents. Confer with Joshua M. Hood. Email to Michael Hauser.	ARCH
2998.0001	11/05/2021	7 A	1	340.00	4.50	1,530.00	Continue evaluating Decisions, transcripts, Nevada Supreme Court opinions, and Motion to Clarify. Continue drafting memorandum regarding . Review Lynita's expert regarding the same. Continue drafting Opposition to Motion for Clarification.	ARCH
2998.0001	11/08/2021	18 A	1	470.00	1.40	658.00	Review, analyze and respond to correspondence. Supplement motion for clarification. Confer with Josh Hood regarding	ARCH
2998.0001	11/08/2021	7 A	1	340.00	2.00	680.00	Confer with Jeffrey P Luszeck regarding Review motion for summary judgment, opposition, and reply in support of motion for summary judgment. Review Motion to Correct. Begin revising Opposition to Motion to Correct and include Countermotion.	ARCH
2 9 98.0001	11/09/2021	5 A	1	220.00	0.60	132.00	Confer with Joshua M. Hood (x3). Review Supreme Court filings regarding . Emails to Joshua M. Hood (x2).	ARCH