

12-14-2011

Hansen v. Roberts Clerk's Record v. 2 Dckt. 38904

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LAW CLERK

3-2-5

IN THE
SUPREME COURT

OF THE
STATE OF IDAHO

CC-1

LARRY HANSEN

VOL. II of III

Plaintiff _____ and

Appellant _____

MATTHEW ROBERTS

Defendant _____ and

Respondent _____

Appealed from the District Court of the _____ Seventh _____ Judicial

District of the State of Idaho, in and for _____ Bonneville _____ County

Hon. _____ William H. Woodland _____, District Judge

Jordan S. Ipsen/Brent Gordon, GORDON LAW FIRM

477 Shoup Ave., Ste. 101, Idaho Falls, ID 83402

Attorney for Appellant

Jennifer Brizee, POWERS TOLMAN, PLLC

PO Box 1276, Twin Falls, ID 83303-1276

Attorney for Respondent

Filed this _____ day of _____, 20_____

_____ Clerk

By _____ Deputy

38904

IN THE SUPREME COURT OF THE STATE OF IDAHO

LARRY HANSEN,)	
)	
Plaintiff/Appellant,)	Supreme Court Docket No. 38904-2011
)	
vs.)	Bonneville County Case No. CV-2009-3163
)	Madison County Case No. CV-2009-585
MATTHEW ROBERTS,)	
)	VOLUME II of III
Defendant/Respondent.)	
_____)	

CLERK'S RECORD ON APPEAL

Appeal from the District Court of the
Seventh Judicial District of the State of Idaho,
in and for the County of Bonneville

HONORABLE WILLIAM H. WOODLAND, District Judge.

Attorney for Appellant

Attorney for Respondent

Jordan S. Ipsen
GORDON LAW FIRM
477 Shoup Ave., Ste. 101
Idaho Falls, ID 83402

Jennifer Brizee
POWERS TOLMAN, PLLC
PO Box 1276
Twin Falls, ID 83303-1276

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ORIGINAL

Jennifer K. Brizee (ISB #5070)
POWERS TOLMAN, PLLC
132 3rd Avenue East
P.O. Box 1276
Twin Falls, Idaho 83303-1276
Telephone: (208) 733-5566

Attorney for Matthew Roberts

MADISON COUNTY
SEP 21 PM 3:04

IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNEVILLE

LARRY HANSEN,

Plaintiff,

vs.

MATTHEW ROBERTS,

Defendant.

MATTHEW ROBERTS,

Plaintiff,

vs.

LARRY HANSEN,

Defendant.

Case No. CV-2009-3163

**AFFIDAVIT OF JENNIFER K.
BRIZEE IN SUPPORT OF MATTHEW
ROBERTS' MEMORANDUM
OF COSTS, DISBURSEMENTS
AND ATTORNEY'S FEES**

Madison County Small Claims
Case No. CV-2009-585

STATE OF IDAHO)
) ss.
County of Twin Falls)

JENNIFER K. BRIZEE, being first duly sworn on oath, deposes and says:

1. I am one of the attorneys of record in this matter for Matthew Roberts and I make this affidavit based upon my own personal knowledge and belief.

2. The bills and receipts attached hereto as Exhibit A and incorporated by reference herein, are true and correct copies of the charges incurred by Matthew Roberts in the defense of the above-entitled action.¹

3. The costs listed in the accompanying Matthew Roberts' Memorandum of Costs, Disbursements and Attorney's Fees are correct, have been necessarily incurred in the above case and are reasonable in amount.

4. The time and labor required in this action is as indicated on the bills.

5. This litigation required the briefing and arguing of numerous motions in order to obtain required information from the opposing party.

6. The billing rate for each attorney involved in this matter is identified below:

(a)	Jennifer K. Brizee	\$130/\$175 per hour
(b)	Douglas G. Abenroth	\$150 per hour
(c)	Nicole Cannon	\$150 per hour
(d)	Judy Graf - Paralegal	\$ 90/\$95 per hour

7. Matthew Roberts was charged attorney's fees and costs as indicated, which fees and costs are reasonable and similar to the amount charged by other attorneys in the area for similar work, or less.

8. The fees charged were based on an hourly computation. The bills submitted were incurred in this action, which resulted in a verdict in favor of Matthew Roberts.

9. The costs identified in item No. 1 of Discretionary Costs were necessary for fees (in addition to fees allowed as a matter of right) charged by expert witnesses for Matthew Roberts. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

¹Please note, information protected under the work product and attorney-client privileges has been redacted.

10. The costs identified in Item No. 2 of Discretionary Costs were necessary for lodging which represents the amount charged for lodging for Matthew Roberts, and his attorney. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

11. The costs identified in item No. 3 of Discretionary Costs were necessary for court reporter fees for the preparation of a partial trial transcript of the testimony of Larry Hansen. The charge is also evidenced on the monthly billings attached hereto and incorporated by reference herein.

12. The costs identified in Item No. 4 of Discretionary Costs were necessary for the deposition of Dr. Heidi Jost which represents Dr. Jost's attendance fee, exhibits attached to transcript, shipping and handling to send the transcript overnight, which was due to plaintiff's late disclosure of Dr. Jost's opinions and subsequent delay relative to her deposition. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

13. The travel costs identified in Item No. 5 of Discretionary Costs were necessary to attend the several hearings and the trial held in Idaho Falls, Idaho; the deposition of Larry Hansen in Idaho Falls, Idaho; the deposition of Dr. Heidi Jost in Jackson, Wyoming; video trial testimony of Matthew Roberts in Salt Lake City, Utah. These costs were billed at 30 miles x \$.55, 4,214 miles x \$.50, and 130 x \$.51, respectively. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

14. The costs identified in Item No. 6 of Discretionary Costs were necessary for express shipping of documents needed by experts. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

15. The copy charges identified in Item No. 7 of Discretionary Costs were necessary for copies of various documents relating to this matter which were required to be made during the course of litigation, either for purposes of producing documents through discovery, providing documents and information to counsel, the Court and my client. These copies were charged at \$.10, \$.08, and \$.06 respectively, per copy for black and white copies/\$.29 per copy for color copies. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

16. The costs identified in Item No. 8 of Discretionary Costs were necessary for obtaining plaintiff's medical bills and represent the individual medical care provider's fee for copying and shipping plaintiff's medical records. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

17. The costs identified in Item No. 9 of Discretionary Costs were necessary for a witness fee (in addition to fees allowed as a matter of right) for Corporal Ray Hermasillo. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

18. The costs identified in Item No. 10 of Discretionary Costs were necessary for reproducing DVDs and developing film of photographs. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

19. The costs identified in item No. 11 of Discretionary Costs were necessary for fees for faxing documents to plaintiff at The UPS Store in Jackson, Wyoming. These were the court-ordered releases necessary to obtain information plaintiff had declined to produce and the Court ordered to be signed by plaintiff. The charges are also evidenced on the monthly billings attached hereto and incorporated by reference herein.

20. Attached as Exhibit B and incorporated by reference herein, are true and correct copies of the pertinent pages of Plaintiff's Answers to Defendant's First Set of Interrogatories, Responses to Requests for Production of Documents, and Responses to Requests for Admissions which are not dated, but were received in our office on March 11, 2010.

21. Attached as Exhibit C and incorporated by reference herein, are true and correct copies of the pertinent pages of Plaintiff's Supplemental Answers to Defendant's First Set of Interrogatories, Responses to Requests for Production of Documents, and Responses to Requests for Admissions which were received in our office via fax on September 20, 2010.

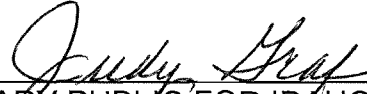
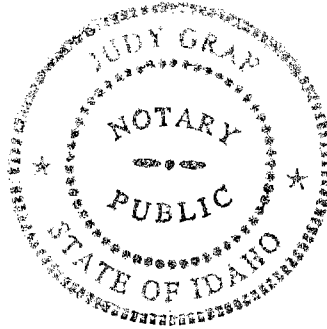
22. Attached as Exhibit D and incorporated by reference herein, are true and correct copies of the pertinent pages of Dr. Heidi Michelsen-Jost's deposition which was held on October 11, 2010.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



JENNIFER K. BRIZEE

SUBSCRIBED AND SWORN To before me this 18th day of March, 2011.




NOTARY PUBLIC FOR IDAHO

Residing at: Twin Falls, Idaho

My commission expires: 6-8-2014

DATED this 18th day of March, 2011.

POWERS TOLMAN, PLLC

By: 
Jennifer K. Brizee

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of March, 2011, I caused a true and correct copy of the foregoing **AFFIDAVIT OF JENNIFER K. BRIZEE IN SUPPORT OF MATTHEW ROBERTS' MEMORANDUM OF COSTS, DISBURSEMENTS AND ATTORNEY'S FEES** to be forwarded with all required charges prepared, by the method(s) indicated below, to the following:

Brent Gordon
GORDON LAW FIRM, INC.
477 Shoup Ave., Suite 101
Idaho Falls, ID 83402

- | | |
|-------------------------------------|------------------|
| <input checked="" type="checkbox"/> | First Class Mail |
| <input type="checkbox"/> | Hand Delivered |
| <input type="checkbox"/> | Facsimile |
| <input type="checkbox"/> | Overnight Mail |



Jennifer K. Brizee

EXHIBIT A

TOLMAN & BRIZEE, P.C.
 132 3rd Avenue East
 P.O. Box 1276
 Twin Falls, Idaho 83303-1276
 (208) 733-5566

TAX ID. No. 82-0516802

Allied Group Insurance
 P.O. Box 2238
 Portland OR 97208-2238

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 November 20, 2009
 Account No: 8000-327M
 Statement No: 3

Attn: Kimber Baumgartner

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours		
09/16/2009	JKB	L120	A104	Review/analyze complaint and summons from Kimber Baumgartner regarding new suit, as authorized by the claims representative. This is a required attorney task, as she is the only individual authorized to accept defense of a matter and perform a conflicts check.	130.00	0.10	13.00
09/17/2009	JKB	L120	A106	Communicate (with client) via lengthy telephone conference with Kimber Baumgartner [REDACTED] as authorized by the claims representative. This is a required attorney function as she is responsible for defense of this action and is the only one authorized to engage in such discussions with the file handler.	130.00	0.50	65.00
	JKB	L120	A103	Draft e-mail to Kimber Baumgartner [REDACTED] y, as authorized by the claims representative. This is a required attorney function as she is the only individual with he personal			

TOLMAN & BRIZEE, P.C.
132 3rd Avenue East
P.O. Box 1276
Twin Falls, Idaho 83303-1276
(208) 733-5566

TAX ID. No. 82-0516802

Allied Group Insurance
P.O. Box 2238
Portland OR 97208-2238

Page: 1
November 20, 2009
Account No: 8000-327M
Statement No: 3

Attn: Kimber Baumgartner

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
09/16/2009	JKB	L120	A104			
			Review/analyze complaint and summons from Kimber Baumgartner regarding new suit, as authorized by the claims representative. This is a required attorney task, as she is the only individual authorized to accept defense of a matter and perform a conflicts check.	130.00	0.10	13.00
09/17/2009	JKB	L120	A106			
			Communicate (with client) via lengthy telephone conference with Kimber Baumgartner [REDACTED]			
			[REDACTED]			
			[REDACTED]. as authorized by the claims representative. This is a required attorney function as she is responsible for defense of this action and is the only one authorized to engage in such discussions with the file handler.	130.00	0.50	65.00
	JKB	L120	A103			
			Draft e-mail to Kimber Baumgartner [REDACTED]			
			[REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only individual with he personal			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L110	A104	knowledge to perform this task. Review/analyze responsive e-mail from Kimber Baumgartner, [REDACTED] as authorized by the claims representative. This is a required attorney function as she is responsible for defense of this action and must review these documents.	130.00	0.10	13.00
JKB	L120	A104	Review/analyze e-mail from Kimber Baumgartner [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is responsible for defense of this action and must be aware of introduction so can contact insured.	130.00	1.00	130.00
JKB	L210	A106	Communicate (with client) via telephone call to Matthew Roberts [REDACTED], as authorized by the claims representative. This is a required attorney function as she is responsible for defense of this action and is the only one authorized to engage in such discussions with the insured.	130.00	0.10	13.00
JKB	L210	A103	Draft multi-page Notice of Special Appearance on behalf of insured to ensure appropriate initial response to complaint while still attempting to confirm service was appropriate and response and so as to ensure no default judgment can be taken against the insured while obtaining information and without waiving defenses which may be available to the insured, per the authorization of the claims representative. This is a required attorney task as the attorney is the only person with the legal knowledge and background, and who is authorized to make decisions regarding proper	130.00	0.20	26.00

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			pleadings to be utilized, and appropriate reservations of rights to be included.	130.00	0.20	26.00
09/22/2009	JKB	L210	A103			
			Draft letter to Kimber Baumgartner [REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	130.00	0.10	13.00
	JKB	L210	A103			
			Draft letter to Matthew Roberts [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to perform this task.	130.00	0.20	26.00
09/23/2009	JG	L210	A104			
			Review/analyze Idaho Repository for Bonneville County to determine if Notice of Special Appearance was filed, as authorized by the claims representative.	90.00	0.10	9.00
09/25/2009	JG	L110	A104			
			Review/analyze Idaho Repository for Madison County to obtain information on Small Claims case, as authorized by the file handler.	90.00	0.10	9.00
	JG	L110	A104			
			Review Idaho Repository for Bonneville County to determine if plaintiff has filed the Motion to Consolidate, as authorized by the claims representative.	90.00	0.10	9.00
09/29/2009	JKB	L110	A107			
			Communicate (other outside counsel) via lengthy telephone call from plaintiff's counsel, Brent Gordon, requesting information regarding Notice of Special Appearance, whether disputing service, discuss acceptance of			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			service he drafted, discuss his conversation with insured, review of photographs, etc., as authorized by the claims representative. This is a required attorney function as she is the only individual authorized to engage in this discussion.	130.00	0.50	65.00
JKB	L110	A106	Communicate (with client) via telephone call to Kimber Baumgartner [REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only individual authorized to engage in this discussion, and the only one with the personal knowledge to perform this task.	130.00	0.30	39.00
10/06/2009						
JG	L110	A104	Review/analyze Idaho Repository for Madison County to determine status of Larry Hansen's criminal case, as authorized by the claims representative.	90.00	0.10	9.00
JG	L110	A104	Review/analyze Idaho Repository for Bonneville County to determine if plaintiff's Motion to Consolidate Cases has been filed, as authorized by the claims representative.	90.00	0.10	9.00
JKB	L210	A106	Communicate (with client) via lengthy telephone conference with Matt Roberts, [REDACTED]			
			[REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only individual authorized to engage in this discussion.	130.00	0.80	104.00
JKB	L110	A103	Draft letter to Rexburg Police Department concerning the police report and photographs to ensure we have a complete copy of the			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			report, as authorized by the claims representative. This is a required attorney function as she is the only individual authorized to engage in such discussion, especially where this case will turn on police officer testimony.			
JKB	L110	A103	Draft e-mail correspondence to Kimber Baumgartner [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only individual with the personal knowledge to perform this task.	130.00	0.20	26.00
JKB	L110	A103	Draft e-mail correspondence to Matthew Roberts, [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only individual with the personal knowledge to perform this task.	130.00	0.10	13.00
JKB	L110	A104	Review/analyze [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the individual responsible for defense of this matter and must be aware of all potential evidence.	130.00	0.10	13.00
				130.00	0.20	26.00
10/08/2009						
JKB	L210	A108	Communicate (other external) via telephone calls to multiple clerk's offices to attempt to ascertain status of small claims action, confirm plaintiff's counsel's representation clerk has already flagged file to be consolidated, as authorized by the claims representative. This is a required attorney function as she is the individual responsible for defense of this matter and is the only one authorized to engage in such conversations.	130.00	0.30	39.00
JKB	L210	A107	Communicate (other outside counsel) via telephone call to			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			plaintiff's counsel to obtain information relative to small claims case, his discussion with small claims clerks, to ascertain status of small claims case, as authorized by the claims representative. This is a required attorney function as she is the individual responsible for defense of this matter and is the only one authorized to engage in such conversations.	130.00	0.20	26.00
10/09/2009	JG	L110 A108	Communicate (other external) via telephone call to Madison County Courthouse to verify pages in Larry Hansen's criminal file for ordering copies, as authorized by the claims representative.	90.00	0.10	9.00
	JG	L210 A103	Draft letter to Madison County Courthouse regarding copies of [REDACTED], as authorized by the claims representative.	90.00	0.10	9.00
	JKB	L210 A107	Communicate (other outside counsel) via telephone call from plaintiff's counsel to discuss proposed stipulation to consolidate in lieu of his motion to consolidate small claims case with district court case, discuss rule of civil procedure regarding same, as authorized by the claims representative. This is a required attorney function as she is the individual responsible for defense of this matter and is the only one authorized to engage in such conversations.	130.00	0.20	26.00
	JKB	L210 A106	Communicate (with client) telephone call to Matthew Roberts [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the individual responsible for defense of			

Hansen v. Roberts
Insured: Matthew Roberts
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Rate Hours

			<p>this matter and is the only one authorized to engage in such conversations.</p>	130.00	0.20	26.00
JKB	L210	A104	<p>Review proposed stipulation provided from plaintiff's counsel relative to consolidation issues and rule regarding same, to determine whether stipulation and proposed consolidation comports with rule, as authorized by the claims representative. This is a required attorney function as she is the individual responsible for defense of this matter and is the only one authorized to review such documents.</p>	130.00	0.20	26.00

10/12/2009

JKB L120 A106

Communicate (with client) via lengthy telephone conference with Matthew Roberts, [REDACTED]

as authorized by the file handler. This is a required attorney function, as she is the only individual authorized to discuss the same with the insured.

130.00 0.40 52.00

10/13/2009

JKB L110 A109

Appear for/attend lengthy meeting with Matthew Roberts, [REDACTED]

as authorized by the file handler. This is a required attorney function as she is the only individual authorized to meet with the insured initially and engage in such

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
JG	L250	A107	Communicate (other outside counsel) via telephone call to Brent Gordon's assistant to discuss contact with Madison County Court regarding consolidation of cases and to vacate the Small Claims trial on October 16, 2009, as authorized by the claims representative.	90.00	0.10	9.00
10/15/2009						
JKB	L110	A103	Draft lengthy, multi-page correspondence to Kimber Baumgartner [REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual with the personal knowledge to perform this task.	130.00	1.10	143.00
JG	L250	A104	Reviewe Idaho Repository website for Madison County to determine if Small Claims trial has been vacated, as authorized by the claims representative.	90.00	0.10	9.00
JG	L250	A107	Communicate (other outside counsel) via telephone call from Mike at Brent Gordon's office to discuss Small Claims trial in Madison County is vacated, as authorized by the claims representative.	90.00	0.10	9.00
JG	L250	A108	Communicate (other external) via telephone call to Small Claims clerk in Madison County to determine Small Claims trial has been vacated, as authorized by the claims representative.	90.00	0.10	9.00
JG	L250	A106	Communicate (with client) via telephone call from Matthew Roberts; [REDACTED] as authorized by the claims representative.	90.00	0.10	9.00

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
10/26/2009	JKB	L110	A103			
			Draft (continue and finalize) letter to Kimber Baumgartner [REDACTED] [REDACTED] per the authorization of the claims representative. This is a required attorney task as the attorney is the only person with the personal and legal knowledge to perform this task, and is the only individual authorized to discuss such liability evaluations.	130.00	0.20	26.00
10/28/2009	JKB	L110	A104			
			Review/analyze e-mail from plaintiff's counsel offering Liberty Mutual photographs and accident reconstruction report, as authorized by the claims representative. This is a required attorney function as the attorney is responsible for the defense of the case, and the attorney is the only person with the authority to determine whether to accept this offer.	130.00	0.10	13.00
10/29/2009	JKB	L110	A104			
			Review/analyze police report obtained directly from agency, including photographs, as authorized by the claims representative. This is a required attorney function, as she is the one responsible for defense of this matter, and must be aware of the original police records.	130.00	0.20	26.00
			For Current Services Rendered		13.70	1,733.00

Recapitulation

Attorney	Hours	Rate	Total
Jennifer Kauth Brizee	12.50	\$130.00	\$1,625.00
Judy Graf	1.20	90.00	108.00

09/21/2009	L190	E112	Court fees - Clerk of the Court, reimbursement for filing Notice of Appearance			58.00
10/12/2009	L110	E124	Clerk of the Court, reimbursement for copies of court records			8.00

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

10/13/2009	L110	E110	Travel to/from Idaho Falls to Rexburg, Idaho to meet with insured and inspect accident scene (30 miles @ \$0.55 per mile)	16.50
10/15/2009	L110	E101	Photocopies (80 copies @ \$0.10 per copy)	8.00
10/15/2009	L110	E124	Color copies (125 color copies @ \$0.29 per copy)	36.25
10/27/2009	L110	E124	Walgreens, reimbursement for photographs of accident site	13.44
11/15/2009	L110	E101	Photocopies (11 copies @ \$0.10 per copy)	1.10
			Total Expenses	<u>141.29</u>
			Total Current Work	1,874.29
			Balance Due	<u>\$1,874.29</u>

Task Code Recapitulation

L110	Fact Investigation/Development	786.00	83.29
L120	Analysis/Strategy	377.00	0.00
L150	Budgeting	169.00	0.00
L190	Other Case Assessment, Development and Administration	0.00	58.00
L100	Case Assessment, Development and Administration	<u>1,332.00</u>	<u>141.29</u>
L210	Pleadings	356.00	0.00
L250	Other Written Motions and Submissions	<u>45.00</u>	<u>0.00</u>
L200	Pre-Trial Pleadings and Motions	401.00	0.00

TOLMAN & BRIZEE, P.C.

Clerk of the Court
Gen & Admin.: Filing Fee

Allied/Roberts, Filing Fee for Notice of Appearance

9/21/2009

14828

58.00

Checking

Filing Fee, CV-09-3163

58.00

TOLMAN & BRIZEE, P.C.

14857

Clerk of the Court
Gen & Admin.: Copy Expense

Re: Allied/Roberts

10/12/2009

8.00

Checking

Re: Case CR-2008-3640

8.00

TOLMAN LAW OFFICE, P.C.
EXPENSE REIMBURSEMENT

CASE: Allied / Roberts (Hanson v.)
FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 10/13/09

PLACE OF TRAVEL: Idaho Falls to Rexburg only

PERSONAL CAR MILEAGE

Total miles 30 at \$.55 \$ 16.50

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 16.50

Allied /
Hansen v. Roberts

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TAX ID. No. 27-1339414

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Page: 1
 December 21, 2009
 Account No: 8000-327M
 Statement No: 4

Attn: Kimber Baumgartner


Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

			Previous Balance			\$1,874.29
				Rate	Hours	
11/16/2009						
	JKB	L110 A103	Draft e-mail correspondence to plaintiffs' counsel responding to his offer of Liberty Mutual file materials, request same, in order to aid in evaluation of liability and damages issues, as authorized by the claims representative. This is a required attorney function as she is responsible for evaluations of liability and damages in this matter.	130.00	0.10	13.00
	JKB	L110 A104	Review/analyze lengthy, multi-page investigative report from Liberty Mutual and accompanying photographs, to aid in determination of liability and damages issues, as authorized by the claims representative. This is a required attorney function as she is responsible for evaluations of liability and damages in this matter.	130.00	0.40	52.00
11/18/2009						
	JG	L120 A108	Communicate (other external) via telephone call to Madison County Court to discuss location of signature on citation to determine potential for arguments related to liability, as authorized by the claims representative.	90.00	0.10	9.00
	JKB	L110 A104	Review/analyze police report obtained directly from the police department to determine whether			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			any additional information is present, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters.			
JKB	L110	A103	Draft letter to Kimber Baumgartner [REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one with the personal knowledge to perform this task.	130.00	0.20	26.00
JKB	L110	A104	Review/analyze [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED], as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters.	130.00	0.20	26.00
JKB	L110	A103	Draft letter to Kimber Baumgartner [REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one with the personal knowledge to perform this task.	130.00	0.20	26.00
JKB	L110	A104	Review e-mail correspondence from Matt Roberts, [REDACTED] [REDACTED], as authorized by the file handler. This is a required attorney function, as she is the only individual authorized to perform this task.	130.00	0.10	13.00
12/01/2009	JG	L310	A103			Draft Notice of Service of Defendant's First Set of

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			Interrogatories and Requests for Production of Documents to Plaintiff, as required by the Court and authorized by the claims representative.	90.00	0.10	9.00
JKB	L310	A104	Review/analyze discovery requests propounded by plaintiff to insured, including interrogatories and requests for production to determine potential theories of plaintiff's case, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and is the only individual authorized to make determinations relative to what information is to be provided in discovery responses.			
			Draft letter to Matt Roberts	130.00	0.20	26.00
JKB	L310	A103	 as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and is the only individual authorized to make determinations relative to what information is to be provided in discovery responses.			
			Draft (begin) objections, answers and responses on behalf of defendant to plaintiff's first set of interrogatories, requests for production of documents and requests for admission, determine the nature and scope of information requested, and issues or facts to be admitted to determine appropriate answers and responses, as authorized by the claims representative. This is a required attorney function as the attorney is responsible for the defense of the case, and the attorney is the only	130.00	0.20	26.00
JKB	L310	A103				

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			person with the authority to determine information to be provided to plaintiff's counsel and what facts should be admitted or denied.	130.00	0.80	104.00
12/02/2009	JG	L310	A103			
			Draft Notice of Service of Defendant's Answers and Responses to Plaintiff's First Set of Interrogatories and Requests for Production of Documents, as required by the Court and authorized by the file handler.	90.00	0.10	9.00
	JG	L310	A103			
			Draft Notice of Service of Defendant's Responses to Plaintiff's First Set of Requests for Admissions, as required by the Court and authorized by the file handler.	90.00	0.10	9.00
12/08/2009	JKB	L310	A103			
			Draft (continue) answers and responses to plaintiff's first set of discovery, including requests for admission, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task, and the only one authorized to make the determination as to objections to be voiced, information to be provided.	130.00	0.70	91.00
12/09/2009	JKB	L120	A107			
			Communicate (other outside counsel) via telephone conference with plaintiff's counsel, Brent Gordon, debate liability issue, correct his misperception regarding vehicles, and where accident occurred, police officer's citation and presupposed testimony, citation results, etc. as authorized by the claims representative. This is a required attorney function since she is the only one authorized to engage in such discussions.	130.00	0.30	39.00

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
12/11/2009	JG	L310	A103			
			Draft Notice of Service of Discovery Document regarding Defendant's Responses to Plaintiff's First Set of Requests for Admissions, as required by the court and as authorized by the file handler.	90.00	0.10	9.00
	JG	L310	A103			
			Draft Notice of Service of Discovery Document regarding Defendant's Answers and Responses to Plaintiff's First Set of Interrogatories and Requests for Production of Documents as required by the court and as authorized by the file handler.	90.00	0.10	9.00
			For Current Services Rendered		4.20	522.00

Recapitulation

<u>Attorney</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jennifer Kauth Brizee	3.60	\$130.00	\$468.00
Judy Graf	0.60	90.00	54.00

12/15/2009	L110	E101	Photocopies (116 copies @ \$0.10 per copy)	11.60
12/15/2009	L110	E124	Color copies (9 color copies @ \$0.29 each)	2.61
			Total Expenses	14.21
			Total Current Work	536.21
			Balance Due	<u>\$2,410.50</u>

Task Code Recapitulation

L110	Fact Investigation/Development	182.00	14.21
L120	Analysis/Strategy	48.00	0.00
L100	Case Assessment, Development and Administration	230.00	14.21
L310	Written Discovery	292.00	0.00
L300	Discovery	292.00	0.00

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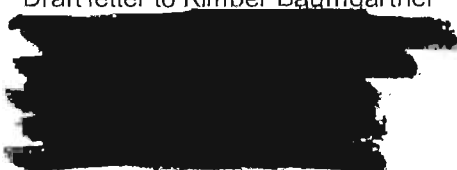
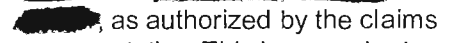
Attn: Kimber Baumgartner

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January 22, 2010
Account No: 8000-327M
Statement No: 5

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

PD 4/2/10

Previous Balance \$2,410.50

				Rate	Hours	
12/17/2009						
	JKB	L110 A104	Review police report obtained directly from the police department to determine whether additional information is included, whether follow-up is required, impact of new information upon liability evaluation, as authorized by the claims representative. This is a required attorney function, as she is the only one authorized to make determinations relative to liability evaluations.	130.00	0.10	13.00
	JKB	L110 A103	Draft letter to Kimber Baumgartner   as authorized by the claims representative. This is a required attorney function as she is the only individual with the personal knowledge to perform this task.	130.00	0.20	26.00
	JKB	L310 A103	Draft (finalize and complete) specialized interrogatories and requests for production of documents to plaintiff, requesting medical history, information needed to establish liability issues in this case and location of accident, as authorized by the claims representative. This is a required			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			attorney function as she is the only individual authorized to make determinations relative to what discovery requests to propound upon plaintiff at beginning of case.	130.00	0.20	26.00
12/18/2009	JKB	L310 A103	Draft (complete and finalize) objections and responses to plaintiff's voluminous requests for admissions, on behalf of defendant determine issues or facts to be admitted, qualifications to denials to avoid later costs and fees, as authorized by the claims representative. This is a required attorney function as the attorney is responsible for the defense of the case, and the attorney is the only person with the authority to determine information to be provided to plaintiff's counsel and what facts should be admitted or denied..	130.00	1.80	234.00
12/21/2009	JKB	L310 A103	Draft (complete and finalize) objections, answers and responses on behalf of defendant to plaintiff's first set of interrogatories, requests for production of documents, determine the nature and scope of information requested, and facts attempting to manipulate within requests, information to be provided, as authorized by the claims representative. This is a required attorney function as the attorney is responsible for the defense of the case, and the attorney is the only person with the authority to determine information to be provided to plaintiff's counsel and what facts should be admitted or denied.	130.00	3.80	494.00
	JKB	L310 A103	Draft e-mail to insured [REDACTED]			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L310	A103	[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to perform this task. Draft e-mail to insured (second e-mail)	130.00	0.20	26.00
JKB	L310	A104	[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to perform this task. Review lengthy e-mail from insured	130.00	0.20	26.00
JG	L310	A103	[REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only one authorized to perform this task, as she is the only one authorized to make determinations relative to information to be provided to plaintiff in discovery responses. Draft Notice of Service of Discovery Document regarding Defendant's First Set of Interrogatories and Requests for Production of Documents to Plaintiff, as authorized by the claims representative.	130.00	0.20	26.00
JKB	L310	A103	Draft letter to Matthew Roberts [REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only individual with the legal knowledge to perform this task.	90.00	0.10	9.00
				130.00	0.10	13.00

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

Rate Hours

JKB L310 A103 Draft letter to Jordan Ipsen, plaintiffs' counsel, regarding verification process to complete discovery process, need for insured to review same for accuracy, as authorized by the claims representative. This is a required attorney function as she is the only individual with the legal and personal knowledge to perform this task.

130.00 0.10 13.00

12/22/2009

JKB L310 A104 Review/analyze second lengthy e-mail from insured [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to perform this task, as she is the only one authorized to make determinations relative to information to be provided to plaintiff in discovery responses.

130.00 0.20 26.00

01/13/2010

JKB L210 A103 Draft letter to Kimber Baumgartner [REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.

130.00 0.10 13.00

For Current Services Rendered 7.30 945.00

Recapitulation

Attorney	Hours	Rate	Total
Jennifer Kauth Brizee	7.20	\$130.00	\$936.00
Judy Graf	0.10	90.00	9.00

01/15/2010 L110 E101 Photocopies (308 copies @ \$0.10 per copy) 30.80

Allied Group Insurance

Page: 5
January 22, 2010
Account No: 8000-327M
Statement No: 5

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

Total Expenses	<u>30.80</u>
Total Current Work	975.80
Balance Due	<u>\$3,386.30</u>

Task Code Recapitulation

L 110	Fact Investigation/Developement	<u>39.00</u>	<u>30.80</u>
L 100	Case Assessment, Development and Administration	39.00	30.80
L 210	Pleadings	<u>13.00</u>	<u>0.00</u>
L 200	Pre-Trial Pleadings and Motions	13.00	0.00
L 310	Written Discovery	<u>893.00</u>	<u>0.00</u>
L 300	Discovery	893.00	0.00

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Ref# 197774

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Page: 1
 February 19, 2010
 Account No: 8000-327M
 Statement No: 6

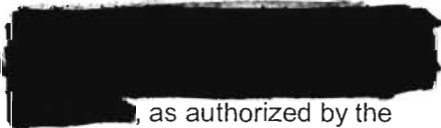
Attn: Kimber Baumgartner

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

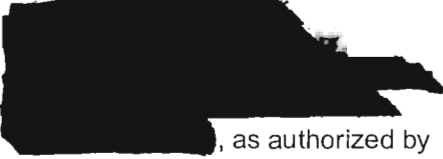
PD 4/12/10

								\$3,386.30
02/01/2010			Write off - credit adjustment to fees/costs on November 2009 statement					-25.50
			Previous Balance					\$3,360.80
					Rate	Hours		
02/05/2010	JKB	L310	A104	Review verification document from insured relative to answers and responses to discovery requests propounded by plaintiff to him, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	130.00	0.10		13.00
	JKB	L310	A103	Draft letter to Jordan Ipsen providing information of verification of discovery responses, no changes to same, verify accuracy of same to him, as required by Idaho Rules of Civil Procedure, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	130.00	0.20		26.00
	JKB	L310	A103	Draft supplemental answers to interrogatories, per information provided by insured, additional information relative to damage to vehicle, location of damage, information relative to prior				

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

			Rate	Hours	
residences, additional objections due to new information of disease and need to protect sensitive health information, etc. as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task, and the only one authorized to make determinations relative to what information to provide to plaintiff, objections available to protect information.			130.00	0.90	117.00
02/08/2010	JG	L310 A103			
	JG	L310 A103	90.00	0.10	9.00
	JKB	L310 A103	90.00	0.10	9.00
	JKB	L310 A103	130.00	0.90	117.00
 , as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this					

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L310	A103	task. Draft letter to Matthew Roberts	130.00	0.10	13.00
						
			, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	130.00	0.20	26.00
JKB	L320	A104	Review reports from radiologist, radiology group, providing information of results of February 3, 2008, x-rays to determine impact upon causation and damages issues, as authorized by the file handler. This is a required attorney function as she is responsible for determining continuance of strategy/defense relative to claimed injuries of plaintiff.	130.00	0.40	52.00
JKB	L330	A104	Review correspondence from plaintiff's counsel providing requested information relative to approved depositions of plaintiffs, determine whether follow-up required, whether can proceed with same prior to mediation process, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	130.00	0.10	13.00
JKB	L320	A104	Review correspondence from Teton MRI, and new medical records, to determine potential for argument of pre-existing condition as theory of defense, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this			

Allied Group Insurance

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February 19, 2010
Account No: 8000-327M
Statement No: 6

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

	Rate	Hours	
matter and/or determine appropriate follow-up required.	130.00	0.40	<u>52.00</u>
For Current Services Rendered		3.50	<u>447.00</u>

Recapitulation

<u>Attorney</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jennifer Kauth Brizee	3.30	\$130.00	\$429.00
Judy Graf	0.20	90.00	18.00

02/15/2010	L110	E101	Photocopies (230 copies @ \$0.10 per copy)	<u>23.00</u>
			Total Expenses	23.00
			Total Current Work	470.00
02/01/2010			PAYMENT RECEIVED - THANK YOU!	-2,385.00
			Balance Due	<u>\$1,445.80</u>

Task Code Recapitulation

L110	Fact Investigation/Developement	0.00	<u>23.00</u>
L100	Case Assessment, Development and Administration	0.00	23.00
L310	Written Discovery	330.00	0.00
L320	Document Production	104.00	0.00
L330	Depositions	13.00	<u>0.00</u>
L300	Discovery	<u>447.00</u>	0.00

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Allied Group Insurance
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March 18, 2010
Account No: 8000-327M
Statement No: 7

Attn: Kimber Baumgartner

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

Previous Balance \$1,445.80

					Rate	Hours	
02/25/2010	JKB	L120	A103	Draft status letter to Kimber Baumgartner, [REDACTED]			
				[REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one with the personal knowledge to perform this task.	130.00	0.20	26.00
03/11/2010	JG	L320	A111	Compile and index documents produced by plaintiff with Plaintiff's Answers to Defendant's First Set of Interrogatories, Responses to Requests for Production of Documents, and Responses to Requests for Admissions, to ensure properly prepared for attorney review and use as exhibits for authorized depositions and trial, as authorized by the claims representative.	95.00	0.40	38.00
	JKB	L310	A103	Draft letter to Kimber Baumgartner, [REDACTED]			
				[REDACTED], per his specific request and authorization. This is a required attorney function			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

			Rate	Hours		
since she is the only one authorized to perform this task.			175.00	0.10	17.50	
03/12/2010	JKB	L310 A103				
Draft letter to Jordan Ipsen providing information of verification by insured of Defendant's Supplemental Answers and Responses to Plaintiff's First Set of Interrogatories and Requests for Production of Documents, as required by Idaho Rules of Civil Procedure rules, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.			175.00	0.10	17.50	
03/15/2010	JKB	L320 A104				
Review lengthy, multi-page discovery responses from plaintiff, and numerous, voluminous attachments, including medical records, photographs, to determine impact upon evaluation of liability and damages issues, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.			175.00	2.40	420.00	
For Current Services Rendered				3.20	519.00	
Recapitulation						
<u>Attorney</u>				<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jennifer Kauth Brizee				0.20	\$130.00	\$26.00
Jennifer Kauth Brizee				2.60	175.00	455.00
Judy Graf				0.40	95.00	38.00
03/15/2010	L110	E101				68.30
Photocopies (683 copies @ \$0.10 per copy)						68.30
Total Expenses						68.30
Total Current Work						587.30

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Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

Balance Due \$2,033.10

Task Code Recapitulation

L110	Fact Investigation/Developement	0.00	68.30
L120	Analysis/Strategy	<u>26.00</u>	<u>0.00</u>
L100	Case Assessment, Development and Administration	26.00	68.30
L310	Written Discovery	35.00	0.00
L320	Document Production	<u>458.00</u>	<u>0.00</u>
L300	Discovery	<u>493.00</u>	<u>0.00</u>

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Allied Group Insurance
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 April 21, 2010

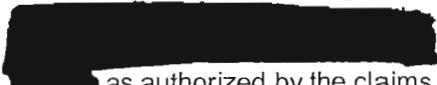

Account No: 8000-327M
 Statement No: 8

Attn: Kimber Baumgartner

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

			Previous Balance				\$2,033.10
				Rate	Hours		
03/22/2010							
	JKB	L230 A104	Review second order for status conference, requiring appearance on March 31 for status conference, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50	
03/23/2010							
	JG	L230 A108	Communicate (other external) via telephone call to Lettie, Judge Anderson's clerk, to discuss upcoming status conference on March 31, 2010, attorney participation and activity for same, as authorized by the claims representative.	95.00	0.10	9.50	
	JG	L230 A107	Communicate (other outside counsel) via telephone call to Jordan Ipsen at Gordon Law Firm regarding upcoming status conference on March 31, 2010, conversation with Judge's clerk, as authorized by the claims representative.	95.00	0.10	9.50	
04/05/2010							
	JKB	L230 A104	Review minute entry from court regarding status conference, ensure accuracy with statements made by counsel, as authorized by the				

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L230	A104	claims representative. This is a required attorney function since she is the only one with the personal knowledge to perform this task. Review Order referring case to mediation as authorized by the claims representative to determine appropriate activity and response. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
JKB	L230	A104	Review Order setting trial and pre-trial conferences as authorized by the claims representative to determine activity for compliance and needed action. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
JKB	L230	A103	Draft letter to Kimber Baumgartner  as authorized by the claims representative. This is a required attorney function since she is the only one with the personal knowledge to perform this task.	175.00	0.10	17.50
04/06/2010	JKB	L120	A106			
			Communicate (with client) via telephone conference with Kimber Baumgartner. 		0.20	35.00

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			[REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one authorized to engage in such discussions.			
JKB	L120	A104	Review e-mail correspondence from Kimber Baumgartner [REDACTED]	175.00	0.50	87.50
			[REDACTED], as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.			
				175.00	0.10	17.50
04/14/2010						
JKB	L120	A106	Communicate (with client) via telephone conference with Matt Roberts, [REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to engage in such discussions.			
JKB	L120	A103	Draft e-mail correspondence to Kimber Baumgartner [REDACTED]	175.00	0.80	140.00
			[REDACTED], as authorized by the claims			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

			Rate	Hours	
		representative. This is a required attorney function since she is the only one authorized to engage in such discussions.			
JKB	L120 A104	Review responsive e-mail from Kimber Baumgartner, [REDACTED]	175.00	0.10	17.50
		[REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one authorized to engage in such discussions.			
JKB	L120 A107	Communicate (other outside counsel) via telephone conference with plaintiff's counsel, discuss intercompany arbitration and impact on case, whether plaintiff has attorney representation via Liberty Mutual, his conversation with Liberty Mutual in-house counsel relative to this matter, and liability issue, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to engage in such discussions.	175.00	0.10	17.50
			175.00	0.60	105.00
		For Current Services Rendered		3.00	509.00

Recapitulation

Attorney	Hours	Rate	Total
Jennifer Kauth Brizee	2.80	\$175.00	\$490.00
Judy Graf	0.20	95.00	19.00

Total Current Work 509.00

04/12/2010 PAYMENT RECEIVED - THANK YOU! -1,445.80

Balance Due \$1,096.30

Task Code Recapitulation

L120	Analysis/Strategy	385.00	0.00
L100	Case Assessment, Development and Administration	385.00	0.00
L230	Court Mandated Conferences	124.00	0.00

Allied Group Insurance

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April 21, 2010

Account No: 8000-327M
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Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

L200 Pre-Trial Pleadings and Motions

124.00

0.00

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Attn: Kimber Baumgartner

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May 17, 2010
Account No: 8000-327M
Statement No: 9

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

			Previous Balance		\$1,096.30
				Rate	Hours
04/26/2010					
JKB	L120	A103	Draft updated status letter to Kimber Baumgartner, [REDACTED]		
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one with the personal knowledge to perform this task.	175.00	0.40 70.00
05/07/2010					
JKB	L120	A106	Communicate with client via lengthy telephone conference with Matt Roberts, [REDACTED]		
			[REDACTED] etc. as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.80 140.00
			For Current Services Rendered		1.20 210.00

Allied Group Insurance

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May 17, 2010
Account No: 8000-327M
Statement No: 9

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

Recapitulation

<u>Attorney</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jennifer Kauth Brizee	1.20	\$175.00	\$210.00

Total Current Work 210.00

Balance Due \$1,306.30

Task Code Recapitulation

L120	Analysis/Strategy	<u>210.00</u>	<u>0.00</u>
L100	Case Assessment, Development and Administration	<u>210.00</u>	<u>0.00</u>

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Attn: Kimber Baumgartner

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

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June 21, 2010
Account No: 8000-327M
Statement No: 10

Previous Balance	\$1,306.30
Balance Due	<u>\$1,306.30</u>

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July 21, 2010
Account No: 8000-327M
Statement No: 11

Attn: Kimber Baumgartner

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

Previous Balance \$1,306.30

				Rate	Hours	
07/08/2010	JKB	L120	A106			
			Communicate (with client) via telephone conference with Kimber Baumgartner, [REDACTED]			
			[REDACTED]			
			as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
07/12/2010	JKB	L110	A109			
			Attend meeting [REDACTED]			
			[REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.70	122.50
07/13/2010	JKB	L120	A107			
			Communicate (other outside counsel) via telephone conference with plaintiffs' counsel, discussion of Liberty Mutual position relative to property damage to insured's			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

			Rate	Hours	
		vehicle, defense of case by plaintiff's insurance carrier, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
07/14/2010	JKB L110 A103	Draft e-mail correspondence to Kimber Baumgartner, [REDACTED] er, as authorized by the claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.10	17.50
		For Current Services Rendered		1.20	210.00
<u>Recapitulation</u>					
<u>Attorney</u>				<u>Hours</u>	<u>Rate</u>
Jennifer K. Brizee				1.20	\$175.00
		Total Current Work			210.00
		Balance Due			<u>\$1,516.30</u>

Task Code Recapitulation

L110	Fact Investigation/Development	140.00	0.00
L120	Analysis/Strategy	70.00	0.00
L100	Case Assessment, Development and Administration	210.00	0.00

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Page: 1
August 20, 2010
Account No: 8000-327M
Statement No: 12

Attn: Kimber Baumgartner

#197774

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

			Previous Balance			\$1,516.30
				Rate	Hours	
07/19/2010						
JKB	L340	A107	Communicate (other outside counsel) via telephone conference with plaintiffs' counsel regarding expert witness deadline, review of court's order and discussion of need to only disclose names of experts, not opinions, in the court required expert witness disclosure document, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to discuss such matters with plaintiff's counsel.	175.00	0.40	70.00
JKB	L130	A108	Communicate (other external) via telephone conference [REDACTED] [REDACTED] [REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussion with potential expert witnesses.	175.00	0.40	70.00
JKB	L130	A108	Communicate (other external) via telephone conference [REDACTED] [REDACTED] office relative to ability and willingness to review potential alleged wrist injury in this matter, if necessary to retain a medical expert			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			witness in this matter and discuss facts, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussion with potential expert witnesses.	175.00	0.20	35.00
JKB	L130	A108	Communicate (other external) via telephone conference with Cathy at [REDACTED] relative to ability and willingness to review potential alleged wrist injury in this matter, if necessary to retain a medical expert witness in this matter, as authorized by the file handler. This is a required attorney function as she in the only individual authorized to engage in such discussion with potential expert witnesses.	175.00	0.20	35.00
JKB	L130	A108	Communicate (other external) via telephone call to [REDACTED] nurse, to discuss with his medical assistant whether he would be able to testify as an expert witness on a wrist injury that required, allegedly, surgery, as authorized by the file handler. This is a required attorney function as she in the only individual authorized to engage in such discussion with potential expert witnesses.	175.00	0.20	35.00
JKB	L130	A108	Communicate (other external) via telephone calls [REDACTED] discuss potential expert witnesses to testify at trial relative to alleged wrist injury [REDACTED], as authorized by the file handler. This is a required attorney function as she in the only individual authorized to engage in such discussion with potential expert witnesses.	175.00	0.20	35.00
JKB	L130	A108	Communicate (other external) via telephone call to [REDACTED] discuss retaining him as expert witness in wrist case, facts of case as authorized by the file handler. This is a required attorney function as she in the only individual	175.00	0.20	35.00

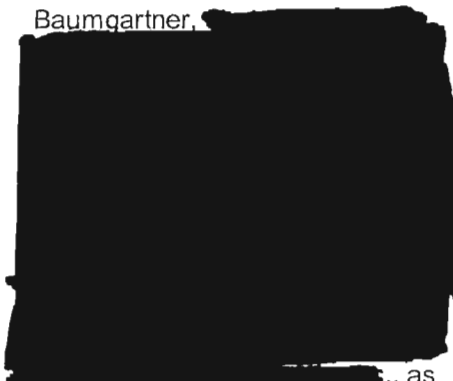
Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			authorized to engage in such discussion with potential expert witnesses.	175.00	0.20	35.00
	JKB	L340	A103			
			Draft lengthy, multi-page Disclosure of Expert Witnesses on behalf of defendant, including names of potential expert witnesses, qualifications and reservations of rights, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and the only one authorized to make determinations relative to expert witnesses	175.00	0.80	140.00
07/21/2010						
	JKB	L130	A103			
			Draft letter to [REDACTED] concerning review of medical records for Larry Hansen, input regarding alleged damages, impact on case as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task, as it involves initial communication with an expert witness.	175.00	0.10	17.50
	JG	L130	A108			
			Communicate (other external) via telephone from [REDACTED] [REDACTED] does not have time available to review the records for Larry Hansen and evaluate, as authorized by the claims representative.	95.00	0.10	9.50
07/22/2010						
	JG	L130	A108			
			Communicate (other external) via telephone from [REDACTED] [REDACTED] would be willing to review the records for Larry Hansen and evaluate, discuss requirements for review, fees and prepayment.	95.00	0.10	9.50
	JKB	L340	A104			
			Review plaintiff's expert witness disclosure document, determine if follow-up required, [REDACTED] [REDACTED] as authorized by the			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.30	52.50
	JKB	L340	A103			
			Draft letter to Kimber Baumgartner, [REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
07/30/2010						
	JKB	L130	A108			
			Communicate (other external) via telephone call from [REDACTED] potential expert witness, [REDACTED] willingness to review case, discussion of up-front retainer needed and parameters of review, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to make determinations relative to retaining expert witnesses.	175.00	0.40	70.00
	JKB	L130	A103			
			Draft e-mail correspondence to [REDACTED] prepare to review same, as authorized by the file handler. This is a required attorney function as she is only individual authorized to communicate with expert witnesses.	175.00	0.20	35.00
08/04/2010						
	JKB	L340	A103			
			Draft Defendant's Supplemental Disclosure of Expert Witnesses regarding Dr. Louis Murdock, expert wrist orthopedic surgeon who has now agreed to review this case, as authorized by the claims			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.20	35.00
JKB	L340	A107	Communicate (other outside counsel) via telephone conference with Mary McDougall, discuss impact of intercompany arbitration on case, lack of defense counsel assigned to Liberty Mutual's insured, etc., as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
08/09/2010						
JKB	L120	A107	Communicate (other outside counsel) via telephone call from Mary McDougall, in house counsel for Liberty Mutual, discussion of her conference with supervisor, lack of defense counsel for insured, lack of information regarding arbitration process, uncertainty whether will pay insured for property damage now, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
08/11/2010						
JKB	L120	A106	Communicate (with client) via lengthy, detailed telephone conference with Kimber Baumgartner,  as authorized by the claims			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.60	105.00
JG	L120	A107	Communicate (other outside counsel) via telephone call to Sky Ispen to obtain plaintiff's approved deposition the week of August 24, 25, or 27 and to inquire regarding x-rays or MRIs for plaintiff; Sky advised he does not have x-rays or MRIs for plaintiff, as authorized by the claims representative.			
JG	L130	A108	Communicate (other external) via telephone call [REDACTED] as authorized by the claims representative.	95.00	0.20	19.00
JG	L130	A103	Draft e-mail [REDACTED] as authorized by the claims representative.	95.00	0.10	9.50
JG	L130	A108	Communicate (other external) via telephone call from [REDACTED] as authorized by the claims representative.	95.00	0.10	9.50
JG	L120	A103	Draft e-mail to Kimber Baumgartner [REDACTED] as authorized by the claims representative.	95.00	0.10	9.50
08/12/2010	JKB	L340	A104			
			Review Plaintiff's Supplemental Answers to Defendant's First Set of Interrogatories, Responses to Requests for Production of Documents, and Responses to Requests for Admissions to determine additional information regarding witnesses for Admissions as authorized by the claims			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

	Rate	Hours	
representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
For Current Services Rendered		5.80	951.00

Recapitulation

<u>Attorney</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jennifer K. Brizee	5.00	\$175.00	\$875.00
Judy Graf	0.80	95.00	76.00

08/15/2010	L110	E101	Photocopies (146 copies @ \$0.06 per copy)	8.76
			Total Expenses	8.76
			Total Current Work	959.76
07/16/2010			PAYMENT RECEIVED - THANK YOU!	-1,306.30
			Balance Due	<u>\$1,169.76</u>

Task Code Recapitulation

L110	Fact Investigation/Developement	0.00	8.76
L120	Analysis/Strategy	168.50	0.00
L130	Experts/Consultants	415.00	0.00
L100	Case Assessment, Development and Administration	583.50	8.76
L340	Expert Discovery	367.50	0.00
L300	Discovery	367.50	0.00

Powers Tolman, PLLC
 Twin Falls Office
 132 3rd Avenue East
 P.O. Box 1276
 Twin Falls, Idaho 83303-1276
 (208) 733-5566

TAX ID. No. 27-1339414

Allied Group Insurance
 P.O. Box 2238
 Portland OR 97208-2238

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Attn: Kimber Baumgartner

#197774

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

Previous Balance \$1,169.76

Rate Hours

08/16/2010

JKB L130 A103

Draft letter to [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED], as authorized by
 the claims representative. This is a
 required attorney function since she
 is the only one with the personal
 and legal knowledge to perform this
 task.

175.00 0.20 35.00

JG L330 A107

Communicate (other outside
 counsel) via telephone call to Sky
 Ipsen inquiring of status of obtaining
 confirmation of Larry Hansen's
 approved deposition, Mr. Ipsen
 advised his client has not called him
 back, as authorized by the file
 handler.

95.00 0.10 9.50

08/17/2010

JKB L330 A103

Draft lengthy, multi-page Idaho
 Rule of Civil Procedure 45
 subpoena duces tecum for
 approved deposition of Larry
 Hansen, including a lengthy list of
 all documents required to be
 produced relative to submission of
 his claim, including outstanding
 medical records, tax returns, etc.,

Hansen v. Roberts

Insured: Matthew Roberts

Claim No.: 72 43 20 0011944

Date of Loss: 12/12/2008

					Rate	Hours	
				as authorized by the file handler. This is a required attorney function as she is the only individual with the personal and legal knowledge to perform this task.	175.00	0.30	52.50
08/19/2010	JG	L330	A107	Communicate (other outside counsel) via telephone call to Sky Ipsen, discuss need for confirmation on the approved deposition of plaintiff, information Mr. Hansen was clearing with his supervisor to attend approved deposition and no answer as of yet, as authorized by the file handler.	95.00	0.10	9.50
08/23/2010	JKB	L330	A107	Communicate (other outside counsel) via telephone conference with plaintiff's counsel, determine whether plaintiff is going to appear for his approved deposition tomorrow, discuss voice mail received by plaintiff's counsel an hour ago from plaintiff stating cannot get time off work, needs two weeks notice, discussion of fact approved deposition on for more than two weeks, discuss upcoming trial date, etc. as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.60	105.00
	JKB	L330	A107	Communicate (other outside counsel) via second telephone conference with plaintiff's counsel, clarify need for approved deposition, time frames, accommodation of allowing to occur on Labor Day to ensure no arguments from plaintiff relative to lack of accommodation, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.10	17.50

Hansen v. Roberts
Insured: Matthew Roberts
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				Rate	Hours		
	JKB	L330	A103	Draft multi-page letter to plaintiff's counsel, confirmation of discussion, his excuses for plaintiff now being unavailable for approved deposition, for submission to court in case it is needed, as authorized by the claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.40	70.00
08/24/2010	JG	L330	A103	Draft Amended Notice of Deposition Duces Tecum of Larry Hansen, as authorized by the file handler.	95.00	0.10	9.50
08/25/2010	JKB	L340	A103	Draft letter to Dr. [REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
08/26/2010	JG	L130	A108	Communicate (other external) via telephone call to [REDACTED], as authorized by the file handler.	95.00	0.20	19.00
08/27/2010	JKB	L130	A109	Attend site visit [REDACTED]			


Hansen v. Roberts
 Insured: Matthew Roberts
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				Rate	Hours	
			the only individual authorized to engage this discussion.	175.00	0.10	17.50
09/05/2010	JKB	L330	A101			
			Plan and prepare for approved deposition of plaintiff, Larry Hansen, including review of [REDACTED] [REDACTED] [REDACTED] of all the issues in this case, to have full knowledge regarding the extent of the alleged injuries of the plaintiff and her treatment of the same to be able to adequately question the deponent regarding the same in the authorized and approved deposition, and as specifically authorized by the claims representative. This is a required attorney function because the attorney is the only individual authorized to take depositions and as such, the attorney is required to be fully aware of all issues, including all medical issues (injuries, treatment, diagnosis, prognosis, current status, etc.) so as to be able to properly address the issues in the authorized deposition.	175.00	1.80	315.00
09/06/2010	JKB	L330	A109			
			Appear for/attend approved deposition of plaintiff in Idaho Falls, ID, including time to obtain original films produced, exhibits, as specifically authorized by the claims representative. This is a required attorney function because the attorney is the only individual authorized to take depositions.	175.00	3.40	595.00
	JKB	L330	A109			
			Appear for/attend meeting with plaintiff's counsel in Idaho Falls, ID, discuss need to move this case toward trial, need for tax returns, need for films, need for additional medical records, opinions of his expert witnesses, as authorized by the file handler. This is a required			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			attorney function because the attorney is the only individual authorized to take depositions.	175.00	0.80	140.00
JKB	L330	A111	Travel to Idaho Falls, to attend approved deposition of plaintiff, Larry Hansen, as specifically authorized by the claims representative. This is a required attorney function because the attorney is the only individual authorized to take depositions.	175.00	5.80	1,015.00
09/07/2010						
JKB	L130	A103	Draft e-mail correspondence to [REDACTED], as authorized by the file handler. This is a required attorney function as she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L130	A108	Communicate (other external) via telephone conference with [REDACTED], as authorized by the file handler. This is a required attorney function as she is the only one authorized to perform this task.	175.00	0.40	70.00
JKB	L130	A103	Draft e-mail correspondence to Kimber Baumgartner, [REDACTED], as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task.	175.00	0.10	17.50
JKB	L250	A106	Communicate (with client) via telephone conference with Kimber Baumgartner, [REDACTED]			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
						
			as authorized by the file handler. This is a required attorney function as she is the only one authorized to perform this task.	175.00	0.40	70.00
JKB	L250	A103	Draft lengthy, multi-page and detailed Memorandum in Support of Motion to Strike Experts, provide case law and arguments relative to Rule 16(b)(4), and expert disclosure via discovery, provide information of court's order regarding same, as authorized by the file handler. This is a required attorney function as she is the only one authorized to perform this task.	175.00	1.50	262.50
JKB	L250	A103	Draft Affidavit of Jennifer K. Brizee in Support of Motion to Strike Plaintiff's Expert Witnesses, including references to various discovery responses, requests for opinions, disclosure documents, etc., as authorized by the file handler. This is a required attorney function as she is the only one authorized to perform this task.	175.00	0.60	105.00
JKB	L250	A103	Draft Motion to Strike Plaintiff's Expert Witnesses, or in the alternative Compel Discovery Supplementation to provide opinions of experts, based upon plaintiff's counsel continued failure to provide requested information, as authorized by the file handler. This is a required attorney function as she is the only individual with the legal knowledge to perform this task.	175.00	0.20	35.00

09/08/2010

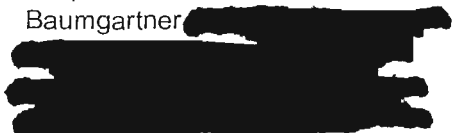
JKB L130 A108 Communicate (other external) via lengthy telephone conference with



Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			[REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.80	140.00
JKB	L130	A103	Draft e-mail correspondence to [REDACTED], as authorized by the file handler. This is a required attorney function as she is the only one authorized to perform this task.	175.00	0.10	17.50
JG	L320	A103	Draft letter to Dr. Douglas Hutchinson, requesting medical records for Larry Hansen and providing Authorization to Disclose Protected Health Information, in order to obtain records from second opinion regarding potential need for third surgery, as specifically requested by expert witness Dr. Murdock, and as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A103	Draft correspondence to Teton Hand Therapy requesting records related to care and treatment of plaintiff, lengthy recovery time in therapy, and potential information related to two subsequent falls involving plaintiff's wrist, as authorized by the file handler.	95.00	0.20	19.00
JG	L320	A103	Draft letter to Dr. Ronald Mills, initial orthopedic surgeon who treated plaintiff after car accident, requesting treatment information in order to prepare proper defense in this matter, as authorized by the file handler.	95.00	0.10	9.50
09/09/2010	JG	L320	A103			
			Draft correspondence to Teton Orthopaedics requesting complete copy of medical records for Larry Hansen, this is the main treating			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
09/13/2010						
JKB	L250	A103	Draft proposed Order Compelling Supplemental Expert Witness Discovery, per court's request from hearing on motion regarding same, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L250	A101	Plan and prepare for motion to strike plaintiff's expert witnesses, or in the alternative to compel supplemental discovery responses, including review of briefing, and additional case law regarding same, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task.	175.00	0.40	70.00
JKB	L250	A109	Attend hearing in Idaho Falls on our motion to strike plaintiff's expert witnesses, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task.	175.00	1.00	175.00
JKB	L250	A111	Travel to Idaho Falls to attend hearing on our motion to strike plaintiff's expert witnesses, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task.	175.00	5.80	1,015.00
JG	L320	A103	Draft letter to Teton Open MRI of Idaho Falls, request radiology studies performed there, in order to provide to our expert, Dr. Murdock for his review and incorporation into preliminary opinions, as authorized by the file handler.	95.00	0.10	9.50
09/14/2010						
JKB	L120	A106	Communicate (with client) via telephone conference with Kimber Baumgartner 			

Hansen v. Roberts
 Insured: Matthew Roberts
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 Date of Loss: 12/12/2008

Rate Hours

			[REDACTED]				
			[REDACTED] as authorized by the file handler. This is a required attorney function as she is only individual authorized to engage in such discussion.	175.00	0.40	70.00	
JKB	L320	A103	Draft letter to Michael Halstead [REDACTED]				
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50	
JG	L320	A103	Draft correspondence to St. John's Medical Center, location where additional imaging was performed, to obtain same to ensure proper preparation on behalf of expert medical witnesses, as authorized by the file handler.	95.00	0.10	9.50	
09/15/2010							
	DGA	L310	A104	Review/analyze voluminous detailed medical bills just produced by plaintiff to determine the amount of special damages plaintiff potentially could claim, determine potential for argument for reductions of figures due to Medicare/Medicaid or other health insurance write offs or adjustments, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine whether the collateral source doctrine applies to reduce damages in this case.	150.00	3.90	585.00
JKB	L120	A104	Review/analyze court's minute entry and order from hearing, to ensure accuracy with hearing results, as authorized by the claims representative. This is a required attorney function since she is the				

Hansen v. Roberts
 Insured: Matthew Roberts
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 Date of Loss: 12/12/2008

			Rate	Hours	
		individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
JG	L320	A103 Draft letter to Eastern Idaho Regional Medical Center, where plaintiff treated in emergency department, to determine whether additional accidents or incidents have occurred regarding plaintiff to provide potential other defenses in this matter, as authorized by the file handler	95.00	0.10	9.50
For Current Services Rendered				36.60	6,155.50

Recapitulation

<u>Attorney</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jennifer K. Brizee	30.80	\$175.00	\$5,390.00
Douglas G. Abenroth	3.90	150.00	585.00
Judy Graf	1.90	95.00	180.50

08/27/2010	L130	E110	Out-of-town 1/3 travel to/from Rexburg (144 miles at \$.50 per mile)	72.00
09/06/2010	L330	E110	Out-of-town travel to/from Idaho Falls (370 miles at \$.50 per mile)	185.00
09/07/2010	L320	E107	Delivery services/Federal Express. This was a necessary expense incurred in order to timely and appropriately get medical records and other information to our expert witness, Dr. Murdock. This charge was incurred due to late production of these records by plaintiffs' counsel, our impending motion to strike plaintiffs' experts and submission of our expert disclosures, which required Dr. Murdock's opinions, which opinions were based upon his review of these records. This charge was not necessitated by any delay of action on our part, but due to plaintiffs' counsel's lateness. Kimber Baumgartner, the claims representative has authorized whatever action necessary to provide the expert witness with documents required for his opinions.	26.95
09/13/2010	L250	E110	Out-of-town travel to/from Idaho Falls (370 miles at \$.50 per mile)	185.00
09/15/2010	L110	E101	Photocopies (587 copies @ \$.06 per copy)	35.22
Total Expenses				504.17

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

Total Current Work 6,659.67

Balance Due \$7,829.43

Task Code Recapitulation

L110	Fact Investigation/Developement	0.00	35.22
L120	Analysis/Strategy	87.50	0.00
L130	Experts/Consultants	<u>1191.50</u>	<u>72.00</u>
L100	Case Assessment, Development and Administration	1,279.00	107.22
L250	Other Written Motions and Submissions	<u>1767.50</u>	185.00
L200	Pre-Trial Pleadings and Motions	1,767.50	185.00
L310	Written Discovery	585.00	0.00
L320	Document Production	141.00	26.95
L330	Depositions	2348.00	185.00
L340	Expert Discovery	35.00	0.00
L300	Discovery	<u>3,109.00</u>	<u>211.95</u>

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Allied / Roberts

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 8/27/10

PLACE OF TRAVEL: Rexburg (1/3 only)

PERSONAL CAR MILEAGE

Total miles 144 at \$.50 \$ 72.00

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 72.00

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Allied / Roberts (Hansen v.)

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 9-6-10

PLACE OF TRAVEL: Idaho Falls

PERSONAL CAR MILEAGE

Total miles 370 at \$.50 \$ 185.00

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 185.00

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Allied/Roberts (Hansen v.)

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 9-13-10

PLACE OF TRAVEL: Idaho Falls

PERSONAL CAR MILEAGE

Total miles 370 at \$.50 \$ 185.00

Miscellaneous \$ _____

Other \$ _____

Explanation: _____

TOTAL \$ 185.00



FedEx Billing Online Plus

FedEx Billing Online Plus
Express Tracking ID Detail

Tracking ID Summary

Tracking ID Number :	872962975338	
Invoice Number :	7-226-42625	Distance Based Pricing, Zone 2
Account Number :	1741-0599-5	The Earned Discount for this ship
Invoice Date :	09/16/2010	Fuel Surcharge - FedEx has applied
Due Date :	10/01/2010	
Tracking ID Balance Due :	\$ 26.95	
Invoice Status :	Open	

Sender Information

JENNIFER BRIZEE
POWERS TOLMAN, PLLC

132 3RD AVE E
TWIN FALLS ID 83301-6202
US

Recipient Information

DR LOUIS MURDOCK
INTERMOUNTAIN ORTHOPEDICS
600 N ROBBINS RD

BOISE , ID 83702
US

Original Reference

Customer Reference# ALLIED/ROBERTS
Department#
RMA#
Reference #2
Reference #3

Updated Reference

Customer Reference#
Department#
Reference #2
Reference #3

Shipment Details

Shipment Date	09/07/2010
Payment Type	Shipper
Service Type	FedEx Priority Overnight
Region Code	02
Package Type	FedEx Box
Pieces	1
Rated Weight	3.0 lbs
Meter No	
Declared Value	0.00

Charges

Transportation Charge	23.55
Fuel Surcharge	1.76
Courier Pickup Charge	4.00
Weekday Delivery	0.00
Earned Discount	-2.36
Total Charges	USD \$ 26.95

Proof of Delivery

Delivery Date	09/08/2010 09:26
Service Area Code	A4
Signed By	P.CARLSON

201

Powers Tolman, PLLC
 Twin Falls Office
 132 3rd Avenue East
 P.O. Box 1276
 Twin Falls, Idaho 83303-1276
 (208) 733-5566

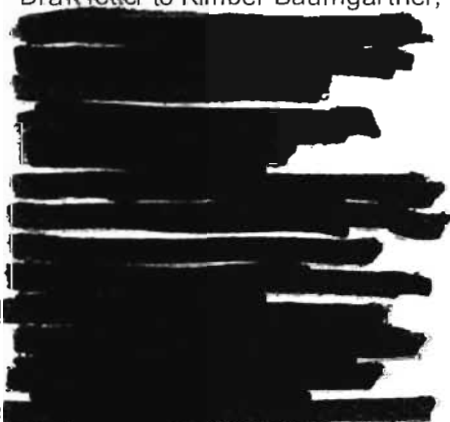
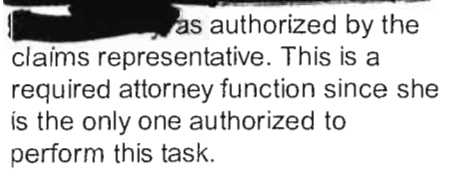
TAX ID. No. 27-1339414

Allied Group Insurance
 P.O. Box 2238
 Portland OR 97208-2238

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 October 21, 2010
 Account No: 8000-327M
 Statement No: 14

Attn: Kimber Baumgartner

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

			Previous Balance			
				Rate	Hours	
						\$7,829.43
09/16/2010						
JG	L320	A103	Draft letter to Emerg-A-Care, request medical records for plaintiff using the Authorization to Disclose Protected Health Information, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A103	Draft letter to request records relative to post-op care from St. John's Family Health & Urgent Care and pre-accident records to determine whether argument for pre-existing condition, as authorized by the file handler.	95.00	0.10	9.50
JKB	L430	A103	Draft letter to Kimber Baumgartner, 			
JKB	L320	A103	 as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L320	A103	Draft letter to Kimber Baumgartner,			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours		
			[REDACTED] [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50	
JKB	L330	A103	Draft lengthy, multi-page, detailed letter to Kimber Baumgartner, [REDACTED] [REDACTED] [REDACTED]. This is a required attorney function since she is the only one authorized to perform this task.	175.00	1.20	210.00	
JKB	L330	A103	Draft multi-page letter to Kimber Baumgartner, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].	175.00	0.90	157.50	
09/21/2010	JKB	L160	A104	Review plaintiff's expert disclosure document, opinions of expert witnesses, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.20	35.00
09/22/2010	JKB	L120	A106	Communicate (with client) via lengthy telephone call from Matt Roberts, [REDACTED] [REDACTED]			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			[REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.80	140.00
09/23/2010	JKB	L310 A104	Review plaintiff's third supplemental discovery responses, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.20	35.00
	JKB	L310 A103	Draft letter to Kimber Baumgartner, [REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
	JKB	L130 A103	Draft lengthy, detailed letter to Kimber Baumgartner, [REDACTED]	175.00	1.50	262.50
	JKB	L130 A103	Draft letter to Jordan Ipsen, requesting approved deposition of Dr. Jost next week, now that expert witness disclosures have been provided, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
	JG	L130 A103	Draft e-mail to [REDACTED]			17.50

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Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			[REDACTED]			
JG	L130	A103	[REDACTED] as authorized by the file handler. Draft e-mail to [REDACTED]	95.00	0.10	9.50
JG	L130	A104	[REDACTED] [REDACTED] as authorized by the file handler. Review responsive e-mail from [REDACTED]	95.00	0.10	9.50
			[REDACTED] [REDACTED] as authorized by the file handler.	95.00	0.10	9.50
09/24/2010						
JG	L320	A111	Compile Teton Hand Therapy, Teton Orthopaedics, Teton Outpatient Services, and Dr. Ronald Mills records received via release, for producing to plaintiff's counsel, as authorized by the file handler.	95.00	1.80	171.00
JKB	L320	A103	Draft letter to Jordon Ipsen requesting plaintiff's tax returns for 2005-2009 by Monday, September 27, 2010, advising a motion to compel will be filed if not received, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L320	A103	Draft letter to Jordon Ipsen regarding plaintiff's medical records received from Teton Hand Therapy, Teton Orthopaedics, Teton Outpatient Services, and Dr. Ronald Mills obtained via the medical release, per attorney agreement, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L340	A103	Draft lengthy, detailed, expert witness disclosure for Scott			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L340	A108	Kimbrough, provide his opinions in this matter, discussion of other areas of expertise, in anticipation of questioning, other areas of potential impeachment for plaintiff. Communicate (other external) via telephone conference	175.00	1.10	192.50
JKB	L130	A108	of as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions Communicate (other external) via telephone conference with	175.00	0.70	122.50
JKB	L130	A106	is a required attorney function as she in the only individual authorized to engage in such discussions. Communicate (with client) via telephone call to Kimber Baumgartner,	175.00	0.80	140.00
JKB	L130	A108	This is a required attorney function as she in the only individual authorized to engage in such discussions. Communicate (other external) via telephone conference with	175.00	0.20	35.00

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Rate Hours

				Rate	Hours	
			[REDACTED]			
			[REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussions.	175.00	0.40	70.00
JKB	L130	A103	Draft e-mail correspondence [REDACTED]			
			[REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task.	175.00	0.10	17.50
09/28/2010						
JG	L320	A108	Communicate (other external) via telephone call to Emerg-A-Care inquiring of status of request for medical records for Larry Hansen; Donna advised they last treated Mr. Hansen in 2003 and that his records are in storage and advised me there is a \$75 fee to retrieve and copy, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A108	Communicate (other external) via telephone call to Mountain Valley Imaging inquiring as to status of request for medical records for Larry Hansen, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A108	Communicate (other external) via telephone call to Jordan Ipsen inquiring he has obtained deposition dates for Dr. Jost; Mr. Ipsen advised he had not heard back from Dr. Jost regarding her available dates and Mr. Ipsen said he would call Dr. Jost again, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A108	Communicate (other external) via telephone call to Jordan Ipsen inquiring he had copies of plaintiff's tax returns for the last five years; Mr. Ipsen advised that plaintiff was			


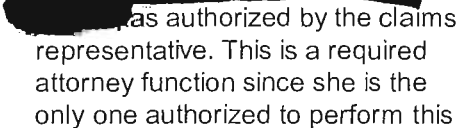
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				Rate	Hours	
			looking for his tax returns and Mr. Ipsen said he would call plaintiff again, as authorized by the file handler	95.00	0.10	9.50
JKB	L340	A103	Draft Motion to Compel Production of Plaintiff's Tax Returns and the approved deposition of Heidi E. Michelsen-Jost, M.D., as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L340	A103	Draft Memorandum in Support of Motion to Compel Production of Plaintiff's Tax Returns and the approved deposition of Heidi E. Michelsen-Jost, M.D. as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	1.10	192.50
JKB	L340	A103	Draft Affidavit of Jennifer K. Brizee in Support of Motion to Compel Production of Plaintiff's Tax Returns and the approved deposition of Heidi E. Michelsen-Jost, M.D. as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.80	140.00
JKB	L320	A103	Draft letter to Jordan Ipsen, per attorney agreement, provide information of medical records for plaintiff received from Madison Memorial Hospital, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L340	A103	Draft letter to Jordan Ipsen requesting approved deposition dates for Dr. Jost and plaintiff's tax returns for 2005-2009, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00

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				Rate	Hours		
	JKB	L130	A108	Communicate (other external) via telephone conference with [REDACTED] [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.60	105.00
09/29/2010	JG	L320	A108	Communicate (other external) via telephone call to Dr. Douglas Hutchinson at University Orthopedic Center inquiring status of request for medical records for Larry Hansen; transferred to University of Utah Hospitals and Clinics and was given another fax number to fax request and release, as authorized by the file handler.	95.00	0.10	9.50
	JG	L320	A108	Communicate (other external) via telephone call to Eastern Idaho Regional Medical Center inquiring status of request for medical records for Larry Hansen; Tony advised records had been scanned to Health Port for copying and that we need to call them to request expedited service, as authorized by the file handler.	95.00	0.10	9.50
	JG	L320	A108	Communicate (other external) via telephone call to Health Port inquiring status of scanned records from EIRMC for medical records for Larry Hansen; representative advised the records have not been uploaded and advised to call tomorrow, as authorized by the file handler.	95.00	0.20	19.00
	JG	L320	A108	Communicate (other external) via telephone call to Branda at Madison Memorial Hospital to inquire if the x-rays will be sent; Branda advised me that I need to call the Radiology			

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				Rate	Hours	
JG	L320	A108	Department, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A108	Communicate (other external) via telephone call to Radiology Department at Madison Memorial Hospital to inquire if the x-rays will be sent; Radiology Department advised me that x-rays had been sent to Branda for sending out, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A108	Communicate (other external) via telephone call to St. John's Medical Center inquiring status of request for medical records for Larry Hansen, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A108	Communicate (other external) via telephone call to Dennis L. Butcher, M.D., inquiring status of request for medical records for Larry Hansen; advised medical records were mailed out Monday or Tuesday, as authorized by the file handler.	95.00	0.10	9.50
JG	L350	A103	Draft Notice of Hearing regarding Motion to Compel Production of Plaintiff's Tax Returns and the Deposition of Heidi E. Michelsen-Jost, M.D., required by the court, and as authorized by the file handler.	95.00	0.20	19.00
JG	L320	A111	Compile (continue) copies of medical records for plaintiff received from Madison Memorial Hospital, as authorized by the file handler.	95.00	1.00	95.00
JKB	L130	A108	Communicate (other external) via lengthy telephone conference with 			
JKB	L130	A106	 as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.80	140.00
JKB	L130	A106	Communicate (with client) via telephone call to Kimber			

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				Rate	Hours	
			Baumgartner, [REDACTED]			
			[REDACTED]			
			authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L130	A108	Communicate (other external) via telephone conference with [REDACTED]			
			[REDACTED]			
			[REDACTED], as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.40	70.00
JKB	L130	A103	Draft letter to [REDACTED]			
			[REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L230	A108	Communicate (other external) via telephone conference with judge's clerk relative to request for Matt Roberts to appear via telephone for pre-trial conference, need for motion to compel, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L230	A106	Communicate (with client) via telephone conference with Matt Roberts, [REDACTED]			
			[REDACTED]			
			[REDACTED] is authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.80	140.00

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				Rate	Hours		
	JKB	L430	A103	Draft (begin) lengthy, detailed jury instructions in this matter, including special verdict form, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	1.40	245.00
09/30/2010	JG	L320	A108	Communicate (other external) via telephone call to Health Port inquiring status of scanned records from EIRMC for medical records for Larry Hansen; representative accepted payment of invoice for records by telephone and advised records would be mailed out within 24 hours, as authorized by the file handler.	95.00	0.10	9.50
	JG	L320	A108	Communicate (other external) via telephone call to Donna at Emerg-A-Care inquiring status of request for medical records for Larry Hansen; Donna advised they were retrieving records from storage and she will call me when they arrive and arrange for payment at that time, as authorized by the file handler.	95.00	0.10	9.50
	JG	L320	A108	Communicate (other external) via telephone call to St. John's Medical Center inquiring status of request for medical records for Larry Hansen; advised records had been sent to their mail room and should be going out today, as authorized by the file handler.	95.00	0.10	9.50
	JG	L320	A108	Communicate (other external) via telephone call to Branda at Madison Memorial Hospital advising Radiology Department advised me that x-rays had been sent to Branda for sending out; receptionist I talked to said Branda had received the x-rays and they had been delivered to the mailroom, as authorized by the file handler.	95.00	0.10	9.50
	JKB	L130	A108	Communicate (other external) Roberts via telephone conference			

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				Rate	Hours	
JKB	L350	A103	Discovery Responses as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	1.60	280.00
JKB	L350	A103	Draft Affidavit of Jennifer K. Brizee in Support of Motion to Strike Dr. Jost and Plaintiff's Wage Loss Claim, or in the Alternative, to Compel Discovery Responses to provide court background to motions, lack of cooperation by plaintiff's counsel, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.80	140.00
JKB	L350	A103	Draft Ex Parte Motion to Shorten Time for Hearing Motion to Strike Dr. Jost and Plaintiff's Wage Loss Claim, or in the Alternative, to Compel Discovery Responses, and Memorandum in Support, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L350	A103	Draft Order Shortening Time for Hearing Motion to Strike Dr. Jost and Plaintiff's Wage Loss Claim, or in the Alternative, to Compel Discovery Responses, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L350	A103	Draft Affidavit of Judy Graf in Support of Motion to Strike Dr. Jost and Plaintiff's Wage Loss Claim, or in the Alternative, to Compel Discovery Responses, to provide information of her efforts to obtain information, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal			

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				Rate	Hours	
			and legal knowledge to perform this task.	175.00	0.40	70.00
JKB	L130	A108	Communicate (other external) via telephone conference (second call)			
			[REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.40	70.00
10/01/2010						
JG	L320	A103	Draft letter to Dr. Michael Packer's office to request copies of medical records for Larry Hansen, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A111	Compile records for Larry Hansen from Madison Memorial Hospital to prepare for trial exhibits, as authorized by the file handler.	95.00	1.40	133.00
JG	L320	A103	Draft letter to Dr. Gary Walker's office, provide release signed by plaintiff, to obtain record to determine if pre-existing injury treated there, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A103	Draft letter to Dr. Brad Egbert's office, request copies of medical records for plaintiff, to determine whether he treated injuries to right wrist before accident, as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A103	Draft letter to Dr. Stephen Vincent's office to request copies of medical records for Larry Hansen. as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A103	Draft letter to Dr. Bryan Hammar's office to request copies of medical records for Larry Hansen. as authorized by the file handler.	95.00	0.10	9.50
JG	L250	A103	Draft Notice of Hearing for Motion for Relief From Order Referring Case to Mediation, as authorized by the file handler.	95.00	0.10	9.50
JG	L310	A103	Draft Notice of Service of Discovery	95.00	0.10	9.50

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				Rate	Hours	
JG	L320	A104	Document; as required by the court, as authorized by the file handler. Review and compare medical records we received directly from providers with medical records plaintiff provided at his deposition, to ensure newly produced records do not include new documents, as authorized by the file handler.	95.00	0.10	9.50
JKB	L130	A108	Communicate (other external) via second telephone call [REDACTED] [REDACTED] [REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	95.00	0.60	57.00
JKB	L320	A104	Review voluminous, detailed, medical records from Madison Memorial Hospital relative to plaintiff, including 70 visits, including prior injuries to right wrist, alleged injury in this automobile accident, to determine potential for cross examination of plaintiff relative to prior injuries, information relative to prior worker's compensation claims, etc.	175.00	0.30	52.50
JKB	L130	A108	Communicate (other external) via lengthy telephone call to [REDACTED] [REDACTED] [REDACTED]	175.00	4.60	805.00
JKB	L130	A103	Draft lengthy, detailed [REDACTED] [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.80	140.00
JKB	L130	A103	Draft e-mail to [REDACTED] [REDACTED]	175.00	0.80	140.00

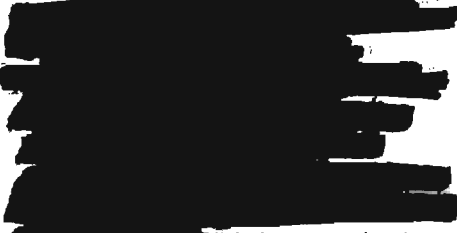

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				Rate	Hours	
			[REDACTED]			
			authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L460	A103	Draft (continue) lengthy, detailed, multi-page jury instructions, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	1.60	280.00
JKB	L430	A103	Draft motion for relief from order requiring parties to mediate this matter, and memorandum in support, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Ex Parte Motion to Shorten Time for Hearing Motion for Relief From Order Referring Case to Mediation, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Order Shortening Time for Hearing Motion for Relief From Order Referring Case to Mediation, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Affidavit of Jennifer Brizee in Support of Motion for Relief From Order Referring Case to Mediation, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.40	70.00
JKB	L340	A108	Communicate (other external) via telephone call [REDACTED]			297

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				Rate	Hours	
			[REDACTED]			
			authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.40	70.00
JKB	L130	A103	Draft e-mail correspondence to [REDACTED]			
			[REDACTED] is authorized by the file handler. This is a required attorney function as she the only individual authorized to perform this task.	175.00	0.10	17.50
JKB	L320	A103	Draft e-mail correspondence to Kimber Baumgartner, [REDACTED]			
			[REDACTED] is authorized by the file handler. This is a required attorney function as she the only individual with the personal and legal knowledge to provide this report.	175.00	0.40	70.00
10/04/2010						
JKB	L250	A104	Review order shortening time regarding motion strike from the Court, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L250	A104	Review order shortening time regarding motion for relief from order to mediate, provided by Court, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this			

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				Rate	Hours	
JKB	L250	A104	task.	175.00	0.10	17.50
			Review motion to continue trial from plaintiff, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.			
JKB	L250	A104	Review plaintiff's opposition to motion to strike Dr. Jost and wage loss claim, including case law relative to tax returns and production of same by a party, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
JKB	L310	A103	Draft letter to Kimber Baumgartner,  This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L250	A103	Draft letter to Kimber Baumgartner,  This is a required attorney function since she is the only one authorized to perform this	175.00	0.10	17.50

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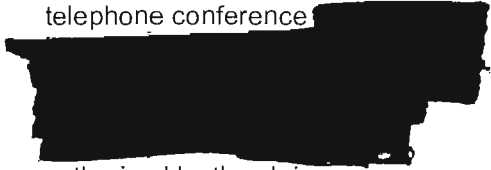
				Rate	Hours	
JKB	L120	A106	task. Communicate (with client) via telephone call to Kimber Baumgartner, [REDACTED]	175.00	0.10	17.50
JKB	L320	A104	[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.50	87.50
JKB	L320	A104	Review medical records of Dr. Gary Walker now obtained via release from plaintiff, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.20	35.00
JKB	L320	A104	Review medical records of Dr. Butcher regarding plaintiff, information of other ailments, alls, etc. to determine whether additional information for use in pre-existing condition defense, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.80	140.00
JKB	L320	A103	Draft letter to Jordan Ipsen, provide information of receipt of medical records for Larry Hansen from Walker Spine and Sports Specialists, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50

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				Rate	Hours	
JKB	L440	A103	Draft (finalize and compete) lengthy, voluminous jury instructions in this matter as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be involved in the drafting of jury instructions.	175.00	4.40	770.00
JKB	L320	A103	Draft letter to Jordan Ipsen, provide information of manner of obtaining MRI report for Larry Hansen from St. John's Hospital. as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L430	A103	Draft jury instruction pleading, as required by the court, and inclusion of standard instructions requested as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be involved in the drafting of jury instructions.	175.00	0.20	35.00
JKB	L320	A103	Draft letter to Jordan Ipsen, discussion of medical records for Larry Hansen received from Dr. Dennis Butcher, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L430	A103	Draft special verdict form, inclusion of negligence of plaintiff Larry Hansen, and proximate cause, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be involved in the drafting of jury instructions.	175.00	0.80	140.00
JKB	L430	A103	Draft lengthy, detailed Trial Memorandum of Law to provide court the case law to support jury instructions, as authorized by the claims representative. This is a required attorney function since she			



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				Rate	Hours	
			is the individual responsible for defense of this matter and must be involved in the drafting of jury instructions.	175.00	1.20	210.00
JKB	L430	A103	Draft motions in limine in this matter, including motion to exclude insurance information, learned treatises, etc. as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be involved in the drafting of jury instructions.	175.00	1.60	280.00
JKB	L430	A103	Draft (complete and finalize) exhibit list for this matter, inclusion of documents defense needs to be admitted into evidence, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be involved in the drafting of jury instructions.	175.00	0.30	52.50
JKB	L430	A103	Draft (complete and finalize) witness list, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be involved in the drafting of jury instructions.	175.00	0.40	70.00
JKB	L410	A108	Communicate (other external) via telephone conference 	175.00	0.20	35.00
JKB	L430	A103	authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions. Draft Joinder for Matt Roberts, so he can be joining in on defense exhibits, witnesses, etc., as authorized by the file handler, per specific discussions. This is a required attorney function as she is	175.00	0.20	35.00


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				Rate	Hours	
			the only individual with the personal and legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L320	A103	Draft defendant's fifth supplemental discovery responses to produce expert witness documents, including photographs and video of Scott Kimbrough, exhibit list, as authorized by the file handler, per specific discussions. This is a required attorney function as she is the only individual with the personal and legal knowledge to perform this task, and the only one authorized to make determinations relative to production of documents.			
JKB	L430	A103	Draft e-mail correspondence to Kimber Baumgartner, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] as authorized by file handler. This is a required attorney function as she is the only individual authorized to engage in such discussion.	175.00	0.40	70.00
JKB	L130	A103	Draft e-mail correspondence to [REDACTED] [REDACTED] [REDACTED] [REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussion.	175.00	0.10	17.50
JKB	L130	A104	Review e-mail correspondence [REDACTED] [REDACTED] [REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussion	175.00	0.10	17.50

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			Rate	Hours	
10/05/2010					
JKB	L320	A103			
					Draft letter to Jordan Ipsen, providing radiology films and records for Larry Hansen from Madison Memorial Hospital, per attorney agreement, obtained via use of release from his client, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.
			175.00	0.10	17.50
JKB	L440	A103			Draft letter to Kimber Baumgartner,
					
					only one authorized to perform this task.
			175.00	0.10	17.50
JKB	L320	A103			Draft letter to Jordan Ipsen, provide information of receipt of records from primary care physician, Dr. Michael Packer, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.
			175.00	0.10	17.50
JKB	L320	A103			Draft letter to Kimber Baumgartner,
					
					authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.
			175.00	0.10	17.50

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				Rate	Hours	
JKB	L320	A103	Draft letter to plaintiff's counsel, provide information of medical records for Larry Hansen from St. John's Medical Center have been received, informal production per attorney agreement, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L430	A109	Attend lengthy hearing on our motion to strike Dr. Jost, or to compel dates for approved deposition, motion to strike wage loss claim, or to compel tax returns, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and is the only one who can appear and argue at hearings.	175.00	1.00	175.00
JKB	L430	A109	Attend meeting (in Idaho Falls) with counsel to contact Dr. Jost's office and request available dates for her approved deposition, per court order, in this matter, at plaintiff's counsel's office (no additional travel needed), as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and is the only one who can appear for this meeting, per court order.	175.00	0.50	87.50
JKB	L430	A106	Communicate (with client) via lengthy telephone conference with Kimber Baumgartner  authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such			



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				Rate	Hours	
JKB	L430	A111	discussions. Travel to Idaho Falls to attend hearing on our motions, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and is the only one who can appear and argue at hearings.	175.00	0.50	87.50
JKB	L130	A104	Review e-mail correspondence [REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to make determinations regarding exhibits in this matter.	175.00	6.00	1,050.00
JKB	L130	A104	Review s [REDACTED] [REDACTED] is authorized by the file handler. This is a required attorney function as she is the only individual authorized to determine which exhibits to be used at trial in this matter.	175.00	0.10	17.50
JKB	L130	A103	Draft e-mail correspondence to [REDACTED] involved in accident, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussions.	175.00	0.10	17.50
JKB	L410	A104	Review e-mail correspondence from Matt Roberts [REDACTED] [REDACTED] This is a required attorney function as she is the only individual authorized to engage in such discussions.	175.00	0.10	17.50
JKB	L410	A104	Review e-mail correspondence [REDACTED] [REDACTED]	175.00	0.10	17.50

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			Rate	Hours		
<p>[REDACTED]</p> <p>authorized by the file handler. This is a required attorney function as she is the only individual authorized to make determinations regarding exhibits.</p>			175.00	0.10	17.50	
10/06/2010	JG	L440 A104	<p>Review [REDACTED]</p> <p>[REDACTED]</p> <p>of this matter, as authorized by the file handler.</p>	95.00	0.20	19.00
	JG	L320 A108	<p>Communicate (other external) via telephone call to Dr. Stephen Vincent's office to obtain medical records for plaintiff; as authorized by the file handler.</p>	95.00	0.10	9.50
	JKB	L430 A104	<p>Review plaintiff's exhibit list, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.</p>	175.00	0.10	17.50
	JKB	L430 A104	<p>Review plaintiff's witness list, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.</p>	175.00	0.10	17.50
	JKB	L430 A104	<p>Review plaintiff's jury instructions and special verdict form, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.</p>	175.00	0.40	70.00

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				Rate	Hours	
JKB	L430	A103	Draft letter to Kimber Baumgartner,  authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L130	A103	Draft letter to 	175.00	0.20	35.00
JKB	L340	A103	Draft lengthy, multi-page Idaho Rule of Civil Procedure 45 subpoena duces tecum for approved deposition of Dr. Jost, including a lengthy list of all documents required to be produced, based upon information obtained during discovery process, including medical records, correspondence with other medical care providers, as authorized by the file handler. This is a required attorney function as she is the only individual with the personal and legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L460	A103	Draft proposed Order for Relief From Order Referring Case to Mediation, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L460	A103	Draft letter to Judge Shindurling regarding proposed Order for Relief From Order Referring Case to Mediation, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L460	A103	Draft Withdrawal of Motion to Strike			

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				Rate	Hours	
			Dr. Jost, per discussions to decline continuance offered by the Court, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.			
JKB	L340	A103	Draft letter to Heidi Michelsen-Jost, M.D., provide information of prepaid fee for approved deposition, per agreement with her office personnel, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L320	A103	Draft letter to Jordan Ipsen providing disks of radiology studies for Larry Hansen from St. John's Medical Center, per attorney agreement, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L430	A103	Draft lengthy letter to Kimber Baumgartner,	175.00	0.10	17.50



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				Rate	Hours	
			[REDACTED]			
			authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.30	52.50
JKB	L430	A106	Communicate (with client) via lengthy telephone conference with Kimber Baumgartner, [REDACTED]			
			[REDACTED]			
			This is a required attorney function as she is the only individual authorized to engage in such strategic discussions.	175.00	0.40	70.00
JKB	L340	A104	Review e-mail correspondence from Kimber Baumgartner, [REDACTED]			
			[REDACTED]			
			This is a required attorney function as she is the only individual authorized to engage in such discussions.	175.00	0.10	17.50
JKB	L340	A103	Draft lengthy e-mail correspondence to Kimber Baumgartner, [REDACTED]			
			[REDACTED]			
			This is a required attorney function as she is the only individual with the personal and legal knowledge to perform this task.	175.00	0.60	105.00

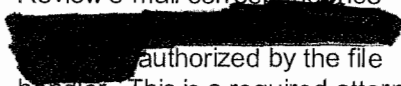
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				Rate	Hours		
10/07/2010	JG	L320	A103	Compile medical records for plaintiff received from Dr. Stephen Vincent, Eastern Idaho Regional Medical Center and Dr. Douglas Hutchinson, as authorized by he file handler.	95.00	0.60	57.00
	JG	L440	A104	Review voluminous medical records from Madison Memorial Hospital to confirm they are in chronological order in preparation for copying for exhibits for trial, as authorized by the file handler.	95.00	1.60	152.00
	JKB	L340	A103	Draft e-mail correspondence to Kimber Baumgartner, [REDACTED]			
	JKB	L340	A104	[REDACTED] This is a required attorney function as she is the only individual with the personal knowledge to perform this task.	175.00	0.10	17.50
	JKB	L340	A104	Review e-mail correspondence [REDACTED] authorized by the file handler. This is a required attorney function as she is the only individual authorized to discuss such matters with expert witnesses.	175.00	0.10	17.50
	JKB	L410	A109	Attend lengthy meeting, [REDACTED] authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	1.10	192.50
	JKB	L410	A111	Travel to Rexburg, Idaho, to meet with [REDACTED]			
	JKB	L320	A103	Draft letter to Jordan Ipsen, provide information of receipt of medical records for Larry Hansen from Dr.	175.00	6.40	1,120.00

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				Rate	Hours		
			Douglas Hutchinson, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50	
JKB	L320	A103	Draft letter to Jordan Ipsen, provide information, per attorney agreement, of records obtained relative to Larry Hansen from Eastern Idaho Regional Medical Center, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50	
JKB	L320	A103	Draft letter to plaintiff's counsel, provide information that medical records for Larry Hansen have been submitted by Dr. Stephen Vincent, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50	
10/08/2010	JG	L440	A111	Compile voluminous medical records from Madison Memorial Hospital that are in chronological order in preparation for copying for exhibit for trial, as authorized by the file handler.	95.00	3.20	304.00
	JG	L440	A111	Compile additional trial exhibits, as authorized by the file handler.	95.00	1.60	152.00
	JKB	L340	A103	Draft e-mail correspondence to Kimber Baumgartner [REDACTED]			
			[REDACTED]				
			[REDACTED]				
			authorized by the file handler. This is a required attorney function as she is the only individual authorized to provide such information and discuss strategy relative to approved depositions of experts.	175.00	0.10	17.50	
	JKB	L420	A103	Draft e-mail correspondence to [REDACTED]			
			[REDACTED]				
			[REDACTED]				

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				Rate	Hours	
			authorized by the file handler. This is a required attorney function as she is the only individual authorized to discuss such matters with expert witnesses.			
JKB	L420	A104	Review e-mail correspondence 	175.00	0.10	17.50
			authorized by the file handler. This is a required attorney function as she is the only individual authorized to discuss such matters with expert witnesses.			
JKB	L430	A107	Communicate (other outside counsel) via telephone call from plaintiff's counsel, Brent Gordon, requesting stipulation regarding medical records and medical bills entered into evidence at trial of this matter, discussion of frustrations relative to discovery issues, need to review exhibits prior to stipulating to same, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in discussions with plaintiff's counsel relative to stipulations for trial.	175.00	0.10	17.50
JKB	L410	A103	Draft e-mail correspondence to Brent Gordon, relative to witnesses, presentation of evidence by plaintiff to determine timing at trial in order to avoid wasting of Court and jury's time in this matter, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to discuss such matters with plaintiff's counsel.	175.00	0.20	35.00
JKB	L410	A104	Review e-mail correspondence from Brent Gordon, indicating trial time in this matter, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to discuss such matters with plaintiff's counsel.	175.00	0.10	17.50
JKB	L430	A103	Draft e-mail correspondence to Brent Gordon concerning exchange of exhibits to determine potential stipulation for admission of exhibits, as authorized by the file handler.	175.00	0.10	17.50

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				Rate	Hours	
			This is a required attorney function as she is the only individual authorized to discuss such matters with plaintiff's counsel.	175.00	0.10	17.50
JKB	L430	A104	Review responsive e-mail from Brent Gordon concerning exchange of exhibits, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to discuss such matters with plaintiff's counsel.	175.00	0.10	17.50
JKB	L430	A104	Review Plaintiff's First Motion in Limine, attempting to strike the citation issued by police officer, as well as the testimony of the police officer in this matter, as authorized by the file handler. This is a required attorney function as she is the individual responsible for defense of this matter, and must be aware of all motions in limine filed on behalf of plaintiff.	175.00	0.20	35.00
JKB	L430	A103	Draft e-mail correspondence to plaintiff's counsel relative to stipulation for exhibits, and acknowledgement of motion and his unwillingness to stipulate to citation as trial exhibit in this matter, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to make determinations regarding exhibits and/or communicate with plaintiff's counsel in this regarding.	175.00	0.20	35.00
JKB	L430	A107	Communicate (other outside counsel) via telephone conference with Brent Gordon, discussion of need to stipulate to exhibits, discussion of frustrations relative to discovery issues, etc., as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L320	A103	Draft letter to Jordan Ipsen, provide information of additional page of medical records for Larry Hansen from Dr. Stephen Vincent, as per attorney agreement for use of			

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				Rate	Hours	
			release to obtain medical records, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Defendant's Second Amended Trial Exhibits to add new medical records received, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft letter to Judge Shindurling, requesting approval of proposed Order Denying Defendant's Motion to Strike Dr. Jost and Plaintiff's Wage Loss Claim, and Order Compelling Plaintiff to Produce Requested Tax Returns. as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L410	A103	Draft Subpoena for Corporal Hermosillo to appear at trial on October 21, 2010, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft letter to Kimber Baumgartner, [REDACTED] authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L130	A108	Communicate (other external) via telephone conference [REDACTED]	175.00	0.20	35.00

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				Rate	Hours	
			review, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.40	70.00
JKB	L120	A106	Communicate (with client) via telephone conference with Matt Roberts. [REDACTED]			
			authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.80	140.00
JKB	L130	A108	Communicate (other external) via telephone conference with [REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.60	105.00
10/09/2010						
JKB	L440	A111	Work (continue) on trial preparations, reviewing medical records for cross-examination as against plaintiff, exhibits, cross-examination of Dr. Jost, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to cross examine witnesses, and must be prepared for the same.	175.00	6.50	1,137.50
JG	L440	A111	Work on compiling of trial exhibits for defense, plaintiffs, and two sets for court, as authorized by the claims representative.	95.00	2.50	237.50
10/10/2010						
JKB	L420	A107	Communicate (other outside counsel) via lengthy telephone			

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				Rate	Hours	
			conference [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	1.00	175.00
JKB	L440	A104	Work (continue) on trial preparations, prepare for approved deposition of Dr. Jost, which will be trial cross-examination as she is not expected to testify at trial, including review or all records of Dr. Jost, records regarding prior injuries of plaintiff to right hand/wrist, formulate questions that will hold up for directed verdict on causation, etc., as authorized by the file handler. This is a required attorney function as she is the only individual authorized to cross-examine witnesses, and must be prepared for the same.	175.00	5.40	945.00
10/11/2010						
JKB	L450	A109	Attend approved deposition of Dr. Jost (Jackson, WY), plaintiff's treating orthopedic surgeon, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task, and the only one allowed to appear at approved depositions.	175.00	2.30	402.50
JKB	L450	A111	Travel to Jackson Hole Wyoming, to attend approved deposition of Dr. Jost, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	10.80	1,890.00
NLC	L120	A104	Analyze [REDACTED] jury instruction [REDACTED] [REDACTED] as authorized			

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				Rate	Hours	
NLC	L400	A103	by claims representative. This is a required attorney function since she is the only one authorized to perform this task.	150.00	0.20	30.00
			Draft amended proposed jury instructions to file with the court in preparation for trial, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.			
DGA	L430	A102	Research Idaho law to determine the admissibility of a traffic citation in a civil litigation	150.00	0.40	60.00
			[REDACTED]			
			in opposition to plaintiff's motion in limine, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the legal issues relating to the motion in limine.			
DGA	L430	A102	Research Idaho law to determine the	150.00	1.90	285.00
			[REDACTED]			
			preparation for drafting defendant's memorandum in opposition to plaintiff's motion in limine, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the legal issues pertaining to the motion in limine.			
DGA	L430	A103	Draft multi-page defendant's memorandum in opposition to plaintiff's first motion in limine, and specifically, legal arguments that plaintiff's traffic citation is admissible as evidence at trial and defendant's expert witness opinion is admissible on the basis it relied upon the police	150.00	2.00	300.00

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				Rate	Hours	
DGA	L430	A102	officer's investigation, including the officer's issuance of the citation to plaintiff, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevant facts and pertinent legal issues relating to the memorandum in opposition to the motion in limine. Research Idaho law to determine whether Idaho's appellate courts specifically defined [REDACTED]	150.00	2.00	300.00
			[REDACTED] as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevance of the legal issues presented regarding proximate causation.	150.00	1.90	285.00
JG	L440	A111	Compile binders for trial exhibits (continue), as authorized by the file handler.	95.00	0.80	76.00
JKB	L410	A103	Draft letter to Corporal Hermosillo regarding Trial Subpoena for Corporal Ray Hermosillo to appear at trial on October 20, 2010, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L410	A103	Draft Acceptance of Service for Corporal Ray Hermosillo's signature, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft letter to Kimber Baumgartner, [REDACTED]			

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Rate Hours

as
authorized by the claims
representative. This is a required
attorney function since she is the
only one with the legal knowledge
to perform this task.

175.00 0.10 17.50

10/12/2010

DGA L310 A108

Communicate (other external) via
telephone call to billing department
at Teton Hand Therapy, Inc., a
medical provider to plaintiff, to
request itemized statement of
medical bill invoices showing the
insurance payments and
adjustments in preparation for
reviewing and analyzing plaintiff's
medical bills to determine the
amount of special damages can be
reduced after trial per the collateral
source, as authorized by the claims
representative. This is a required
attorney function as the attorney is
the individual with the knowledge
required to determine whether the
collateral source doctrine applies to
reduce damages in this case.

150.00 0.20 30.00

DGA L310 A104

Review/analyze (continue)
voluminous detailed medical bills
disclosed by plaintiff's health care
providers to determine the amount
of special damages plaintiff
potentially could claim, determine
potential for argument for
reductions of figure due to
Medicare/Medicaid or other health
insurance write offs or adjustments
per collateral source doctrine, as
authorized by the claims
representative. This is a required
attorney function as the attorney is
the individual with the knowledge
required to determine whether the
collateral source doctrine applies to
reduce damages in this case.

150.00 4.40 660.00

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JKB	L130	A108	by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
			Communicate (other external) via telephone call from [REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.			
JKB	L340	A103	Draft lengthy, detailed letter to Kimber Baumgartner, [REDACTED]	175.00	0.20	35.00
			[REDACTED] authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.			
JKB	L430	A103	Draft Renewed Motion to Strike Plaintiff's Wage Loss Claim, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.80	140.00
JKB	L430	A103	Draft (begin) Affidavit of Jennifer K. Brizee in Support of Renewed Motion to Strike Plaintiff's Wage Loss Claim as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Motion for Order Compelling Plaintiff to Execute Release for Unemployment Documents and Department of Family Service Documents, and memorandum in support of same, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
				175.00	0.90	157.50


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				Rate	Hours	
JKB	L430	A103	Draft Affidavit of Jennifer K. Brizee in Support of Motion for Order Compelling Plaintiff to Execute Release for Unemployment Documents and Department of Family Service Documents, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.50	87.50
JKB	L430	A103	Draft Ex Parte Motion to Shorten Time for Hearing Motion for Order Compelling Plaintiff to Execute Release for Unemployment Documents and Department of Family Service Documents, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Order Shortening Time for Hearing Motion for Order Compelling Plaintiff to Execute Release for Unemployment Documents and Department of Family Service Documents, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Ex Parte Motion to Shorten Time for Hearing Renewed Motion to Strike Plaintiff's Wage Loss Claim, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Order Shortening Time for Hearing Renewed Motion to Strike Plaintiff's Wage Loss Claim, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00

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				Rate	Hours	
JKB	L250	A103	Draft lengthy, detailed, objections to plaintiff's jury instructions, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.80	140.00
JG	L250	A103	Draft Notice of Hearing on Renewed Motion to Strike Plaintiff's Wage Loss Claim, as required by the court, and as authorized by the file handler.	95.00	0.10	9.50
JG	L250	A103	Draft Notice of Hearing on Motion for Order Compelling Plaintiff to Execute Release for Unemployment Documents and Department of Family Service Documents, as required by the court, and as authorized by the file handler.	95.00	0.10	9.50
10/13/2010						
JKB	L450	A111	Attend pre-trial conference (in Idaho Falls) with the court and counsel, including hearings on various motions in limine, discussions related to same, related to judge's inability to sit for trial, substitute judge, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must attend the pre-trial conference in this matter.	175.00	1.50	262.50
JKB	L450	A111	Travel to Idaho Falls, Idaho, to attend pre-trial conference, hearing on various motions, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must attend the pre-trial conference in this matter.	175.00	6.00	1,050.00
JKB	L320	A108	Communicate (other external) via telephone call to Attorney General's office in Wyoming to determine appropriate steps to obtain unemployment records for Mr. Hansen, inform of court's order of			

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				Rate	Hours	
			today, and information provided by receptionist to my assistant that court-ordered release would not be honored, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
DGA	L310	A104	Review/analyze (continue) voluminous detailed medical bills disclosed by plaintiff's in his trial exhibit to determine the amount of special damages plaintiff potentially could claim, determine whether accurate, compare with previously produced bills to determine whether any new bills, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine whether the collateral source doctrine applies to reduce damages in this case.	150.00	2.20	330.00
10/14/2010	DGA	L430	A102	Research Idaho law to determine latest changes to law th		
						
			as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevance of the collateral source doctrine.	150.00	0.60	90.00
JKB	L350	A103	Draft Order Requiring Rudd & Company, PLLC, to Produce Form W-2s for Larry Hansen and Jackie Hansen for Tax Years 2005-2009, as authorized by the claims representative. This is a required			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L350	A103	Draft Order Requiring Larry Hansen to Sign Releases for Wyoming Department of Employment and Department of Family Services. as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JG	L320	A103	Draft Authorization to Release Information and File for the Wyoming Department of Employment to obtain unemployment information for Larry Hansen as authorized by the file handler.	95.00	0.20	19.00
JG	L320	A103	Draft Authorization to Release Information and File for the Wyoming Department of Family Services to obtain disability information for Larry Hansen as authorized by the file handler.	95.00	0.10	9.50
JG	L320	A103	Draft Authorization to Release Information and File for Rudd & Company, PLLC, to obtain Form W-2s for tax years 2005-2009 for Larry Hansen as authorized by the file handler.	95.00	0.20	19.00
JG	L440	A104	Review and compare medical records contained in plaintiff's trial exhibits with the medical records contained in defendant's trial exhibits to determine if there is anything different in plaintiff's trial exhibits, as authorized by the file handler.	95.00	1.70	161.50
JKB	L440	A104	Review plaintiff's lengthy, numerous exhibits, to determine whether will stipulate to same, Review order from Court for status conference in this matter, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task, and is the one responsible for trial of this matter.	175.00	1.80	315.00

Hansen v. Roberts
Insured: Matthew Roberts
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				Rate	Hours	
JKB	L440	A107	Communicate (other outside counsel) via lengthy, detailed telephone conference with plaintiff's counsel to discuss stipulations to exhibits, objections to same, plaintiff's exhibits and defendant's exhibits, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.70	122.50
JKB	L440	A103	Draft lengthy letter to Sky Ipsen, in follow-up to conversation concerning exhibits to stipulate, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.40	70.00
JKB	L120	A106	Communicate (with client) via lengthy, detailed telephone conference with Kimber Baumgartner, [REDACTED] [REDACTED] [REDACTED] This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.60	105.00
JKB	L420	A108	Communicate (other external) via telephone conference [REDACTED] [REDACTED] [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.80	140.00
JKB	L430	A108	Communicate (other external) via telephone conference with [REDACTED] [REDACTED] [REDACTED] as authorized by the claims			

Hansen v. Roberts

Insured: Matthew Roberts

Claim No.: 72 43 20 0011944

Date of Loss: 12/12/2008

				Rate	Hours	
			representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L430	A104	Review releases from plaintiff to determine proper information included, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L440	A101	Plan and prepare for (begin) on opening argument, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.40	70.00
JKB	L440	A101	Plan and prepare for (begin) closing argument as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.60	105.00
10/15/2010						
DGA	L440	A102	Research Idaho law to determine standard for exclusion of photographs offered by plaintiff which incorrectly depict the crash scene with snow and orange cones pursuant to a motion in limine, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge to determine the relevance of factual evidence and the law governing admission of evidence.	150.00	0.50	75.00
JKB	L320	A103	Draft letter to Wyoming Department of Employment, requesting information per release for information and file, as authorized by the claims representative. This is a required attorney function since			

Hansen v. Roberts

Insured: Matthew Roberts

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				Rate	Hours	
			she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L320	A103	Draft letter to Wyoming Department of Family Services, provide release for information and file and requesting same, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L320	A103	Draft letter to Rudd & Company, PLLC, regarding release for Form W-2s and requesting same, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft (finalize) order relative to our motions in limine in this matter, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft (finalize and complete) order relative to releases to be signed by plaintiff, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft letter to Judge Anderson, provide information of proposed Order Regarding Defendant's Motions in Limine and proposed Order Requiring Plaintiff to Sign Releases for Wyoming Department of Employment, Department of Family Services, and Rudd & Company, PLLC, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
			perform this task.	175.00	0.20	35.00

Hansen v. Roberts
 Insured: Matthew Roberts
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 Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L440	A103	Draft letter to Kimber Baumgartner,  as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L440	A103	Draft letter to Matthew Roberts,  as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L430	A103	Draft Defendant's Motion in Limine Re: Photos, and memorandum in support, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.90	157.50
JKB	L430	A103	Draft Affidavit of Jennifer K. Brizee in Support of Defendant's Motion in Limine Re: Photos, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Ex Parte Motion to Shorten Time for Hearing Defendant's Motion in Limine Re: Photos, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft Order Shortening Time for Hearing Defendant's Motion in Limine Re: Photos., as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L430	A103	Draft letter to Kimber Baumgartner,			

Hansen v. Roberts
Insured: Matthew Roberts
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				Rate	Hours	
						
			as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L430	A104	Review W2 information faxed by accountant's office, to determine whether shows collection of unemployment during wage loss period, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.40	70.00
JKB	L320	A108	Communicate (other external) via telephone call from supervisor relative to release to obtain disability information, need to send to Attorney General's office, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L320	A108	Communicate (other external) via telephone call from attorney at Attorney General's office, discuss release signed by plaintiff, context, etc., inability to produce today, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L440	A107	Communicate (other outside counsel) via telephone conference with Sky Ipsen, discuss other			

Hansen v. Roberts
 Insured: Matthew Roberts
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				Rate	Hours	
			location where redactions are located in medical records, discussion of orders I have submitted to the court per our motions, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L440	A104	Review e-mail correspondence from Brent Gordon, stating will not stipulate to certain exhibits, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L440	A103	Draft responsive e-mail to Brent Gordon, request information relative to how long he will take for case in chief, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L440	A104	Review responsive e-mail from Brent Gordon relative to time for case in chief, redactions in medial records, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L440	A103	Draft (second) responsive e-mail to Brent Gordon relative to redactions of exhibits, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one			

Hansen v. Roberts
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				Rate	Hours	
JKB	L420	A101	authorized to perform this task. Plan and prepare for examination of Scott Kimbrough, [REDACTED] [REDACTED] [REDACTED]	175.00	0.10	17.50
JKB	L420	A101	authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task. Plan and prepare for examination of John Droge, [REDACTED] [REDACTED] [REDACTED]	175.00	2.00	350.00
JKB	L420	A108	authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task. Communicate (other external) via [REDACTED] [REDACTED] [REDACTED]	175.00	1.80	315.00
JKB	L420	A108	as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task. Communicate (other external) via lengthy telephone conference with [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	175.00	0.80	140.00
			disclosure document; as authorized by the file handler. This is a			

Hansen v. Roberts
Insured: Matthew Roberts
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				Rate	Hours	
JKB	L440	A104	required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task. Review/analyze [REDACTED] [REDACTED]	175.00	1.50	262.50
JKB	L440	A108	as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task. Communicate (other external) via telephone calls to Jackson Hole Police Department to obtain report regarding additional accident involving plaintiff, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.20	35.00
JKB	L440	A104	Review accident report regarding additional accident involving plaintiff, as authorized by the file handler. This is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.50	87.50
JKB	L440	A101	Plan and prepare for (begin) on direct examination of Corporal Hermosillo in this matter, in preparation for trial, [REDACTED] [REDACTED] this is a required attorney function as she is responsible for defense and trial of this matter, and will be handling trial of this matter, and therefore, is the only one authorized to perform this task.	175.00	0.10	17.50
				175.00	0.50	87.50

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For Current Services Rendered Rate Hours
163.00 26,453.50

Recapitulation

<u>Attorney</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jennifer K. Brizee	125.90	\$175.00	\$22,032.50
Douglas G. Abenroth	15.70	150.00	2,355.00
Nicole L. Cannon	0.60	150.00	90.00
Judy Graf	20.80	95.00	1,976.00

09/15/2010	L320	E124	Reimbursement for medical records from Teton Hand Therapy for Larry Hansen.	24.60
09/16/2010	L320	E124	Reimbursement for medical records from Teton Orthopaedics for Larry Hansen.	50.00
09/17/2010	L320	E124	Reimbursement for medical records from Teton Outpatient Services for Larry Hansen.	75.00
09/28/2010	L320	E124	Reimbursement for medical records from Health Port for Larry Hansen.	101.29
09/28/2010	L320	E124	Reimbursement for medical records from Madison Memorial Hospital for Larry Hansen.	97.50
09/28/2010	L320	E124	Reimbursement for medical records of Larry Hansen from St. John's Medical Center.	73.80
09/29/2010	L320	E124	Reimbursement for medical records of Larry Hansen from University of Utah Hospitals & Clinics.	9.00
09/30/2010	L320	E124	Reimbursement for medical records for Larry Hansen from HealthPort.	101.29
10/01/2010	L320	E124	Reimbursement for medical records of Larry Hansen from Family Medical Center.	25.00
10/01/2010	L320	E107	Reimbursement for Fed-Ex delivery. This charge was not created or generated by any delay or inactivity on our part. This charge was incurred to send a check to Family Medical Center in order to receive medical records as soon as possible for trial preparation and to provide the records to plaintiffs' counsel. Again, this was not any fault of our office, and this was the fastest means in which to have the records to our office prior to the hearing and to avoid a continuance of the trial date. The claims representative has authorized whatever means necessary in order to move this matter forward towards our trial date in October.	22.47
10/04/2010	L320	E107	Reimbursement for Fed-Ex delivery. This charge was not created or generated by any delay or inactivity on our part. This charge was incurred because the medical records of Mr. Hansen were sent to the wrong address. We were able to track the records down and in order to receive them prior to relevant hearings with the court and to provide the records to plaintiffs' counsel, it was necessary to have	

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the records sent via federal express to our office. Again, this was not any fault of our office, and this was the fastest means in which to get the records to our office prior to the hearing and to avoid a continuance of the trial date. The claims representative has authorized whatever means necessary in order to move this matter forward towards our trial date in October.

				27.00
10/05/2010	L430	E110	Out-of-town travel to/from Idaho Falls (370 miles at \$.50 per mile)	185.00
10/06/2010	L320	E124	Reimbursement for medical records for Larry Hansen from Eastern Idaho Neurology	30.00
10/06/2010	L320	E107	Reimbursement for Fed-Ex delivery. This charge was not created or generated by any delay or inactivity on our part. This charge was incurred to send Dr. Yost the required (authorized) deposition fee after court order allowing deposition and to ensure she received before authorized deposition. The claims representative has authorized whatever means necessary in order to move this matter forward towards our trial date in October.	21.33
10/07/2010	L410	E110	Out-of-town travel to and from Rexburg (434 miles at \$.50 per mile)	217.00
10/08/2010	L320	E124	Reimbursement for CD of medical records and xrays received from University of Utah Medical Center Dept of Radiology.	10.00
10/11/2010	L320	E124	Reimbursement for reproduction of DVD of accident reconstruction.	25.41
10/11/2010	L450	E110	Out-of-town travel to/from Jackson Hole Wyoming (500 miles at \$.50 per mile)	250.00
10/13/2010	L450	E110	Out-of-town travel to/from Idaho Falls (370 miles at \$.50 per mile)	185.00
10/14/2010	L430	E124	Reimbursement for fax service fee.	11.75
10/15/2010	L110	E101	Photocopies (6701 copies @ \$0.06 per copy)	402.06
			Total Expenses	1,944.50
10/13/2010	L320	E115	Deposition transcript of Heidi Michelsen-Jost, MD	670.47
			Total Advances	670.47
			Total Current Work	29,068.47
09/21/2010			PAYMENT RECEIVED - THANK YOU!	-1,169.76
			Balance Due	<u>\$35,728.14</u>

Task Code Recapitulation

L110	Fact Investigation/Development	0.00	402.06
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Hansen v. Roberts

Insured: Matthew Roberts

Claim No.: 72 43 20 0011944

Date of Loss: 12/12/2008

L120	Analysis/Strategy	502.50	0.00
L130	Experts/Consultants	2076.00	0.00
L160	Settlement/Non-Binding ADR	35.00	0.00
L100	Case Assessment, Development and Administration	<u>2,613.50</u>	<u>402.06</u>
L230	Court Mandated Conferences	175.00	0.00
L250	Other Written Motions and Submissions	326.00	0.00
L200	Pre-Trial Pleadings and Motions	<u>501.00</u>	<u>0.00</u>
L310	Written Discovery	1099.50	0.00
L320	Document Production	2486.00	1364.16
L330	Depositions	367.50	0.00
L340	Expert Discovery	1155.00	0.00
L350	Discovery Motions	719.00	0.00
L300	Discovery	<u>5,827.00</u>	<u>1,364.16</u>
L400	Trial Preparation and Trial	60.00	0.00
L410	Fact Witnesses	1505.00	217.00
L420	Expert Witnesses	1417.50	0.00
L430	Written Motions and Submissions	5495.00	196.75
L440	Other Trial Preparation and Support	5097.00	0.00
L450	Trial and Hearing Attendance	3605.00	435.00
L460	Post-Trial Motions and Submissions	332.50	0.00
L400	Trial Preparation and Trial	<u>17,512.00</u>	<u>848.75</u>

310 East Broadway
 Jackson, WY 83001
 Phone: 307-734-2877
 Fax: 307-734-282
 tetonhandtherapy.com

Teton Hand Therapy
 POB 4596/310 East Broadway
 Jackson, WY 83001
 Bookkeeping: 800-330-7135
 Federal Tax ID: 84-1400140

*Roberts
 lived/Hansen*

37 North First E
 Driggs, ID 834
 877-734-2877

Patient Powers Tolman

Date of Service: 9-15-10
 Appointment Time: THH

Diagnosis #1 _____ #2 _____ #3 _____ Provider: _____

Service	Code	Fee	Service	Code	Fee	Service	Code	Fee
EVALUATIONS			Custom Splint Description			Dressing Supplies		
New Patient Evaluation Limited Involved	97003		Static/Dynamic/Hinged			Adaptic	99070	
			Splinted Area(s)			Coban / Stat Wrap	99070	
Established Patient Re-Evaluation	97004		Finger Hand Wrist			Finger Gauze Tape	99070	
			Forearm Upper Arm Shoulder			Roll bandage Sterile Non-Sterile	99070	
Modalities			Short Arm			Silvadene/ Other Ung 99070		
Electrical Stimulation, attended 15 min	97032		Long Short Arm			Sterile: Glove Barrier	99070	
Electrical Stimulation, supervised 15 min	97014		Long Arm			Telfa Steristrip 2x2	99070	
Fluido Hydro Whirlpool 15 min	97022		Special Components			Xeroform	99070	
Hot Pack Cold Pack Cryoprob	97010					Vaseline Guaze	99070	
Iontophoresis, 15 min	97033		FINGER			Sterile Saline	99070	
Paraffin, 15 min	97018		Stax	L3927		Exercise Equip		
TENS/direct current	65440		LMB	L3925		Digiflex Color	A9300	
Ultrasound/Phonophoresis 15 min	97035		Gutter	L3935		Hand Helper	A9300	
Unlisted Modality	97039		Serial Cast	L3935		Theraband ___	A9300	
			Trigger/Volar Plate	L3935		Theraputty ___	A9300	
Procedures 15min/ea			Buddy Straps	A4570		Theraball ___	A9300	
BTE Evaluation	97750		HAND			Weight ___	A9300	
BTE Exercise	97530		Cast FRC	L3808		Home Range Pulley	A9300	
CPM/Compres Garment Fitting	97504		CMCJ	L3808		Bocked Bender	99070	
Manual Therapy MFR/STM, ULTT, Joint Mob	97140		Gamekeeper	L3808		Foam Ball	99070	
Neuromuscular Re-education	97112		Hand Based	L3808		Scar Management		
Orthotic Fabrication Modification	97504		Radial/Ulnar	L3808		Kinesiotape	99070	
Therapeutic Activity functional activity, peds, self care	97530		Comfort Cool thumb	L3911		Elastomer sm/med/lrg	99070	
			Comfort Cool wrist	L3909		Gel Sheet sm/med/lrg	A6025	
Therapeutic Exercise	97110		FOREARM			Rolz roller	E1399	
Wound Care /Dressing Change /Suture Removal	97799		Cast FRC	L3808		Mini Massager	99070	
Wound Care Mechanical Debridement	97597		Circumferential	L3808		Ionto/Phon Supplies		
Wound Care Sharps Debridement	97602		Cock-Up	L3808		Ionto meds/elec	4595	
SPECIAL TEST/EVALUTAION			Dorsal/Volar Block	L3808		Edema Control		
Dexterity Edema: CircumF/Volume	97750		Intrinsic Plus/Safe Position	L3808		Digi sleeve/Barbie	99070	
ROM, Sensory, Strength	97750		Radial/Ulnar	L3808		Stockinette Elas	99070	
OTHER SERVICES			Resting Pan	L3808		Swell Spot	A9999	
Impairment Testing	97750		Radial Nerve	L3901		Edema Glove	E1399	
FCE	97750		ELBOW/SHOULDER			Instructions/Other		
Medical Testimony	99075		Ant/Post Static	L3808		<i>copy fee</i>	<u>2460</u>	
Work Site Evaluation	97799		Long Arm Shoulder	L3808	Total Charge			
Work hardening Initial 2 hrs	97545		Sarmiento	L3808		Check Cash Credit	<u>3.3</u>	
Each additional hour	97546		AFO Leg	L3808		Amount Pd		

Larry Hansen Medical Records

434457068881
TETON ORTHOPAEDICS
555 E. BROADWAY
JACKSONHOLE, WY 83002
307-733-3900

POWERS • TOLMAN
PLLC
ATTORNEYS

TERMINAL I.D.: 70688810

AMEX
XXXXXXXXXXXX2104 *
SALE
BATCH: 000114 INU: 5
DATE: SEP. 16, 10 TIME: 13:49:52
AUTH NO: 263444 U CODE RESP: V
TOTAL \$50.00
GENERAL MERCHANDISE 00

Webpage: www.powerstolman.com
Email: contact@powerstolman.com

Twin Falls Office:
Tolman • Brizee, PC

Steven K. Tolman
Jennifer K. Brizee
Nicole L. Cannon
Douglas G. Abenroth

132 Third Avenue East
Twin Falls, Idaho 83301
Post Office Box 1276
Twin Falls, Idaho 83303
Telephone (208) 733-5566
Facsimile (208) 733-5444

X I AGREE TO PAY ABOVE TOTAL AMOUNT
ACCORDING TO CARD ISSUER AGREEMENT
(MERCHANT AGREEMENT IF CREDIT VOUCHER)

September 14, 2010

CUSTOMER COPY

(307) 739-7683

Heidi E. Michelsen Jost, M.D.
Attention: Medical Records Dept.
555 E. Broadway
Jackson, WY 83001

RECEIVED
SEP 20 2010
BY: _____

RE: Patient: Larry Hansen
Social Security No.: [REDACTED]
Date of Birth: [REDACTED]

Dear Records Clerk:

Our office represents Matthew Roberts in litigation involved with the above-named patient. Please provide us with photocopies of all materials from your file with respect to treatment provided to Larry Hansen, which would include, but not be limited to, the following:

History, examinations, diagnosis, treatment, prognosis including any present or future disability, nursing notes, physician orders, operative reports, medication records, x-ray or radiologic imaging reports, x-ray or radiologic imaging films for studies, therapy records, as well as any and all other medical reports or records made with respect to the above-named patient.

If possible, please provide the films on CD, and I would request one set of CDs.

Attached is an Authorization to Disclose Protected Health Information for release of medical records and file signed by Larry Hansen allowing us to receive the above information on his behalf.

Please also provide us with copies of all of your billings for Mr. Hansen's treatment, as well as your charge for providing this information. If the cost for obtaining these medical records will exceed \$500, please call me first for approval before proceeding.

300

Allied/Hansen/Roberts



TETON OUTPATIENT SERVICES
150 ALPINE WAY
JACKSON, WY 83301
207-733-5566

MERCHANT ID: 00000000000000000000
DATE: 09/13/2011 11:43:00 AM

RECORD NUMBER: 001
ACCOUNT: 00000000000000000000
CARD TYPE: AM/EXPRESS
TRAN TYPE: SALE
MTR CODE: 159999

AMOUNT 75.00

PLEASE PRINT CARD

THANK YOU
DUPLICATE COPY

POWERS TOLMAN, PLLC

132 3rd Avenue East
P.O. Box 1276
Twin Falls, Idaho 83303-1276
Telephone: (208) 733-5566
FAX: (208) 733-5444

← Copy to

RECEIVED
SEP 20 2011

BY: _____

FAX COVER SHEET

TIME: _____

MESSAGE FAXED TO #: (307) 734-7365 Attention: Medical Records

PLEASE DELIVER TO: Teton Outpatient Services

MESSAGE FROM: Judy Graf for Jennifer K. Brizee

NO. OF PAGES TO FOLLOW: 4

COMMENTS: RE: Hansen v. Roberts

Letter (2 pgs.)

Authorization to Disclose Protected Health Information (2 pgs.)

HARD COPY WILL NOT FOLLOW.

If you do not receive the number of pages indicated above, please call (208) 733-5566 as soon as possible.

IMPORTANT: This communication is intended solely for the use of the individual or entity to which it is addressed. It contains information that is confidential and/or privileged. If you are not responsible for delivering this communication to the intended recipient, you are hereby notified that the disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via regular postal service. Thank you.

Allied/Roberts/Hansen

RECEIVED
SEP 13

340

HealthPort
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
(770) 754 - 6000

HealthPort INVOICE

Invoice #: 0081517469
Date: 9/28/2010
Customer #: 1479980

Ship to:

JUDY GRAF
TOLMAN AND BRIZEE PC
132 3RD AVENUE EAST
PO BOX 1276
TWIN FALLS, ID 83303-1276

Bill to:

JUDY GRAF
TOLMAN AND BRIZEE PC
132 3RD AVENUE EAST
PO BOX 1276
TWIN FALLS, ID 83303-1276

Records from:

EASTERN IDAHO REG. MED. CENTER
3100 CHANNING WAY
IDAHO FALLS, ID 83404

Requested By: TOLMAN AND BRIZEE PC
Patient Name: HANSON LARRY

DOB:
SSN:



Description	Quantity	Unit Price	Amount
Per your request, please let this serve as your fee approval notice for medical records requested from the facility listed above. If you would like to approve this amount please contact a HealthPort representative at 770-754-6000 . If you would like to expedite delivery of your request, please go to www.HealthPortPay.com to pay electronically.			
Basic Fee			22.00
Retrieval Fee			0.00
Per Page Copy (Paper) 1	59	1.20	70.80
Shipping/Handling			2.92
Subtotal			95.72
Sales Tax			5.57
Invoice Total			101.29
Balance Due			101.29

Pay your invoice online at www.HealthPortPay.com
Please remit this amount : \$ 101.29 (USD)

HealthPort
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
(770) 754 - 6000

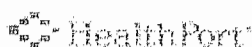
Invoice #: 0081517469
Check # _____
Payment Amount \$ _____

Please return stub with payment.

Please include invoice number on check.

To pay invoice online, please go to www.HealthPortPay.com or call (770) 754 6000.

Allied / Roberts / Hansen



[Help](#) | [Contact Us](#)

[Find Invoices](#)

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[Pay Your Invoices](#)

[Need help with this page?](#)

Your request has been posted and is being processed.
You will receive a confirmation email from us within the next 24 hours.

Your HealthPort transaction ID for this payment is CC807542.
Please reference this number if contacting Customer Service.

The credit card confirmation number for this transaction is 2858599932940008284279.

Thank you for using HealthPort Pay.

Invoice #	Patient Name	Invoice Balance	Payment Amount
0081517469	HANSON LARRY	\$101.29	\$101.29
	Total		\$101.29

[Print](#)

[Return to HealthPort Pay home page](#)

043



RECEIPT

Madison Memorial Hospital
Health Information Management
P.O. Box 310
Rexburg, ID 83440
P. 208-359-6538
F. 208-359-6413
TAX ID: 82-6000 1347

RECEIVED
SEP 28 2010
BY: _____

To:
POWERS TOLMAN
132 THIRD AVE EAST
BOX 1276
TWIN FALLS, ID 83303

Regarding Patient: LARRY W HANSEN

Description and Charges:
Request for Medical Records
Fee 1 per page: 0.15 Number of pages: 550
Fee 2 per page: Number of pages:
Fee 3 per page: Number of pages:
Retrieval Fee: 15.00
PAID WITH CREDIT CARD FOR 97.50

Comments

Thank you for your payment!

Retrieval Fee: 15.00
+ Fee 1: 82.50
+ Fee 2:
+ Fee 3:

Total amount paid: _____

Thank you for your payment.

Request Number 4020

Allied / Roberts / Hansen

Invoice

0000004708

Requestor

Date of Request: 09/13/2010
 Date of Completion: 09/28/2010

POWERS & TOLMAN - ATTORNEYS
 PO BOX 8756
 BOISE, ID 83707

Information

Content: Confidential Healthcare Information

HANSEN, LARRY W

Medical Record #: 1715485

Origin: ST. JOHN'S MEDICAL CENTER 830230892
 PO BOX 428
 JACKSON, WY 83001

Description	Quantity	Unit Price	Amount
Base Rate:			\$15.00
Total Page Charges: (Defined amount per copy.)	168	\$0.35	\$58.80
Total Charges:			\$73.80
Charge Balance:			\$73.80
Total Amount Paid:			\$0.00
Invoice Balance			\$73.80

Please return this portion with your payment.

Amount Due: \$73.80

Amount Included:

HANSEN, LARRY W

Medical Record #: 1715485

ST. JOHN'S MEDICAL CENTER
 PO BOX 428
 ATTN: PATIENT ACCOUNTING
 JACKSON, WY 83001

Allie / Roberts

Invoice Summary

University of Utah Hospitals & Clinics
Health Information
50 N Medical Dr
Salt Lake City UT 84132
Tax ID# 87-60-00525
(801) 581-2704



RECEIVED
OCT 07 2010

BY:

Attn: JUDY GRAF
POWERS & TOLMAN (TWIN FALLS OFFICE)
132 THIRD AVENUE - EAST
PO BOX 1276
TWIN FALLS, ID 83301

Request Date: September 29, 2010
Invoice Date: October 4, 2010 Invoice #: 165152

For copying records on: **Larry Hansen**
Request ID #: Unknown

Number of pages copied:	18
Total Page Charge	9.00
Expedite Fee	0.00
Total Charges:	9.00
Payments Received:	0.00
Adjustments/Credits:	0.00
Balance Due:	9.00

This information may contain **Private, Controlled and/or Restricted** information intended only for the use of the individual or entity named above. If you are not the intended recipient of this information, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any review, dissemination, distribution, or copying of this information is strictly prohibited. If you have received this information in error, please notify us immediately by telephone, and return the original information to us at the address on this envelope via the U.S. Postal Service.

Please Return Lower Portion with Payment to:

University of Utah Hospitals & Clinics
Health Information
50 N Medical Dr Salt Lake City UT 84132

Requester: POWERS & TOLMAN (TWIN FALLS OFFICE)
Patient: **Larry Hansen**
Invoice #: 165152
Invoice Date: October 4, 2010
Balance Due: **9.00**

Amount Paid: _____

Allied Roberts

HealthPort
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
(770) 754 - 6000

 **HealthPort**
INVOICE

Invoice #: 0081517469
Date: 9/30/2010
Customer #: 1479980

Ship to:

JUDY GRAF
TOLMAN AND BRIZEE PC
132 3RD AVENUE EAST
PO BOX 1276
TWIN FALLS, ID 83303-1276

Bill to:

JUDY GRAF
TOLMAN AND BRIZEE PC
132 3RD AVENUE EAST
PO BOX 1276
TWIN FALLS, ID 83303-1276

Records from:

EASTERN IDAHO REG. MED. CENTER
3100 CHANNING WAY
IDAHO FALLS, ID 83404

Requested By: TOLMAN AND BRIZEE PC
Patient Name: HANSON LARRY

DOB:
SSN:



Description	Quantity	Unit Price	Amount
Authorization Via:	Phone	Date:	9/30/2010 11:20:03 AM
Pre-Authorization By:	Judy	Amount:	101.29
Basic Fee			22.00
Retrieval Fee			0.00
Per Page Copy (Paper) 1	59	1.20	70.80
Shipping/Handling			2.92
Subtotal			95.72
Sales Tax			5.57
Invoice Total			101.29
Less Payment			-101.29
Balance Due			0.00

Pay your invoice online at www.HealthPortPay.com

Terms: Net 30 days

HealthPort
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
(770) 754 - 6000

Invoice #: 0081517469

Check # _____

Payment Amount \$ _____

Please return stub with payment.

Please include invoice number on check.

To pay invoice online, please go to www.HealthPortPay.com or call (770) 754 6000.

Allied / Roberts

343

170

TOLMAN & BRIZEE, P.C.

15647

Family Medical Center
Gen & Admin.:Medical Records Expense Medical records for Larry Hansen, Allied/Roberts

10/1/2010

25.00

✓

Checking

Larry Hansen medical records

25.00



FedEx Billing Online Plus

FedEx Billing Online Plus
Express Tracking ID Detail

Tracking ID Summary

Tracking ID Number :	872962975110	
Invoice Number :	7-250-09504	Distance Based Pricing, Zone 2
Account Number :	1741-0599-5	The Earned Discount for this ship
Invoice Date :	10/07/2010	Fuel Surcharge - FedEx has applied
Due Date :	10/22/2010	
Tracking ID Balance Due :	\$ 22.47	
Invoice Status :	Open	

Sender Information

JUDY GRAF
POWERS TOLMAN, PLLC

132 3RD AVE E
TWIN FALLS ID 83301-6202
US

Recipient Information

MICHAEL PARKER MD
FAMILY MEIDICAL CENTER
1 PROFESSIONAL PLZ

REXBURG , ID 83440
US

Original Reference

Customer Reference# ALLIED /ROBERTS/HANSEN
Department#
RMA#
Reference #2
Reference #3

Updated Reference

Customer Reference#
Department#
Reference #2
Reference #3

Shipment Details

Shipment Date	10/01/2010
Payment Type	Shipper
Service Type	FedEx Priority Overnight
Region Code	02
Package Type	FedEx Envelope
Pieces	1
Rated Weight	0.0 lbs
Meter No	
Declared Value	0.00

Charges

Transportation Charge	17.00
Fuel Surcharge	1.47
Courier Pickup Charge	4.00
Weekday Delivery	0.00
Earned Discount	-1.70
DAS Comm	1.70
Total Charges	USD \$ 22.47

Proof of Delivery

Delivery Date	10/04/2010	10:07
Service Area Code		AM
Signed By	A.SAUREY	

365

AMCA | Roberts | Hansen

FedEx Express US Airbill

FedEx Tracking Number 8737 8646 1108

0200

Sender's Copy

1 From Please print and press hard. Date 10/4 Sender's FedEx Account Number

Sender's Name Powestolman Phone 208 577-5100

Company Address 345 Bobwhite Ct STE 150 City Boise State ID ZIP 83706

2 Your Internal Billing Reference First 24 characters will appear on invoice.

3 To Recipient's Name Powestolman Phone

Company Address 132 3rd Ave East HOLD Weekday FedEx location address REQUIRED: 2005

Address Twin Falls State ID ZIP 83303 HOLD Saturday FedEx location address REQUIRED: 2005

4a Express Package Service FedEx Priority Overnight FedEx Standard Overnight FedEx First Overnight FedEx 2Day FedEx Express Saver

4b Express Freight Service FedEx 1Day Freight FedEx 2Day Freight FedEx 3Day Freight

5 Packaging FedEx Envelopes FedEx Pak FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options SATURDAY Delivery No Signature Required Direct Signature Indirect Signature

Does this shipment contain dangerous goods? No Yes As per attached Shipper's Declaration Yes Shipper's Declaration not required

7 Payment Bill to: Sender Recipient Third Party Credit Card Cash/Check

Total Packages 1 Total Weight 2 lbs Total Declared Value \$0

Your liability is limited to \$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms and conditions of our Liability.

Rev. Date 2/10 Part # 50291 © 2010 FedEx PRINTED IN U.S.A. 579

Ship on the go at mobile.fedex.com Tap into all our FedEx shipping tools with FedEx Mobile.

FedEx Office

691 S CAPITOL BOISE, ID 83702

Location: 801K Device ID: 801K-POS1 Employee: 2016624 Transaction: 74088349845

PRIORITY OVERNIGHT 873786461108 2.05 lb (S) 27.00 Scheduled Delivery Date 10/05/2010

Shipment subtotal: 27.00 Total Due: 27.00 (M) CreditCard: *****2237

M = Weight entered manually S = Weight read from scale T = Taxable item

Subject to additional charges. See FedEx Service Guide at fedex.com for details. All merchandise sales final.

Visit us at: fedex.com Or call 1.800.GoFedEx 1.800.463.3339

October 4, 2010 4:32:28 PM

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Allied / Roberts

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 10/5/10

PLACE OF TRAVEL: Idaho Falls

PERSONAL CAR MILEAGE

Total miles 370 at \$.50 \$ 185.00

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 185.00

med records
Larry Hansen

EASTERN IDAHO NEUROLOG
2353 CORONADO ST
IDAHO FALLS, ID 83404
208-552-4823

TERMINAL ID.: 74958283
MERCHANT #: 380979476081

VISA
*****4419 EXP:XX/XX KEVED CNP
MAIL ORDER
BATCH: 000020 INU: 000001
Oct 06, 10 11:45
RRN: 027917602583 AUTH:007284
CVV2: H
TRAN SEQ #: 000306

APPROVAL 007284

TOTAL \$30.00

THANK YOU!

MERCHANT COPY

Allied / Roberts

351



FedEx Billing Online Plus

FedEx Billing Online Plus
Express Tracking ID Detail

Tracking ID Summary

Tracking ID Number :	872962975121	
Invoice Number :	7-258-07859	Distance Based Pricing, Zone 3
Account Number :	1741-0599-5	The Earned Discount for this ship
Invoice Date :	10/14/2010	Fuel Surcharge - FedEx has applied
Due Date :	10/29/2010	
Tracking ID Balance Due :	\$ 21.33	
Invoice Status :	Open	

Sender Information

JENNIFER BRIZEC
 POWERS TOLMAN, PLLC
 132 3RD AVE E
 TWIN FALLS ID 83301-6202
 US

Recipient Information

HEIDI MICHELSEN-JOST M D
 TETON ORTHOPAEDICS
 555 EAST BROADWAY
 JACKSON , WY 83002
 US

Original Reference

Customer Reference# ALLIED/ROBERTS/HANSEN
 Department#
 RMA#
 Reference #2
 Reference #3

Updated Reference

Customer Reference#
 Department#
 Reference #2
 Reference #3

Shipment Details

Shipment Date: 10/06/2010
 Payment Type: Shipper
 Service Type: FedEx Standard Overnight
 Region Code: 03
 Package Type: FedEx Envelope
 Pieces: 1
 Rated Weight: 0.0 lbs
 Meter No:
 Declared Value: 0.00

Charges

Transportation Charge: 17.50
 Fuel Surcharge: 1.58
 Courier Pickup Charge: 4.00
 Weekday Delivery: 0.00
 Earned Discount: -1.75
 Total Charges: USD \$ 21.33

Proof of Delivery

Delivery Date: 10/07/2010 10:46
 Service Area Code: AM
 Signed By: C. COFFMAN

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Allied / Roberts

FILE NO: _____

ATTORNEY: JWB

DATE OF TRAVEL: 10/7/10

PLACE OF TRAVEL: Lexburg

PERSONAL CAR MILEAGE

Total miles 434 at \$.50 \$ 217.00

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 217.00



DEPARTMENT OF RADIOLOGY

LAW

FIRM: Powers Tolman

PATIENT NAME: Larry Hansen

MEDICAL RECORD# 19471622

COST PER SHEET OF FILM OR CD: \$ 10.00

TOTAL COST: \$ 10.00

DATE SENT: 10-8-10

Make checks payable to:

**UNIVERSITY OF UTAH MEDICAL CENTER
DEPARTMENT OF RADIOLOGY**

Send checks to:

C.A.M.T.

729 Arapeen Drive

Salt Lake City, UT. 84108

ATTN: TED LASHLEE (Radiology Fileroom)

RECEIVED
OCT 12 2010
BY: _____

Allied | Roberts

051



1139 FALLS AVE. E. #3
TWIN FALLS, ID 83301

invoice

RECEIVED
OCT 14 2010

208-735-1970

DATE	INVOICE #
10/11/2010	8963

BILL TO

TOLMAN LAW OFFICE
P.O. BOX 1276
TWIN FALLS, ID. 83303-1276

SHIP TO

TOLMAN LAW OFFICE
132 3rd AVE. EAST
TWIN FALLS, ID. 83301
Allied/Roberts/Hansen

P.O. NUMBER	TERMS	REP	SHIP	VIA	PROJECT
Judy	Net 30	(208) 735-1970	10/11/2010	customer pickup	

QUANTITY	ITEM CODE	DESCRIPTION	PRICE EACH	AMOUNT
3	DVD COPIES	Idaho Sales Tax	7.99 6.00%	23.97T 1.44

Thank you for your business.

Customer
Phone Number.....

Total \$25.41

Balance Due \$25.41

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Alicia Roberts

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 10/11/10

PLACE OF TRAVEL: Jackson Hole, Wyoming

PERSONAL CAR MILEAGE

Total miles 500 at \$.50 \$ 250.00

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 250.00

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Allied / Roberts

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 10/13/10

PLACE OF TRAVEL: Idaho Falls

PERSONAL CAR MILEAGE

Total miles 370 at \$.50 \$ 185.00

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 185.00

208-733-5444

Jennifer

The UPS Store - #1818
970 W. Broadway, Suite E
P.O. Box 30,000
Jackson Hole, WY 83002
(307) 733-9250

10/14/10 04:57 PM

We are the one stop for all your
shipping, postal and business needs.

The UPS Store
THANK YOU .. BRENDA A. SMITH



001 500314 (018)	TO \$	3.00
Lead Sheet		
002 000004 (018)	TO \$	8.75
Fax Service	QTY 5	
Reg Unit Price	\$	1.75

SubTotal \$ 11.75
Total \$ 11.75

American Express \$ 11.75
ACCOUNT NUMBER * *****2104

Receipt ID 89363682643321888323 006 Items
CSH: Kristen Tran: 1126 Reg: 003

Allied / Roberts

363



"Excellence in Court Reporting Since 1970"

Billed to:

Jennifer K. Brizee
Powers Tolman, PLLC
132 Third Avenue East
P.O. Box 1276
Twin Falls, ID 83303-1276

Billed: 10/13/2010

RECEIVED
OCT 14 2010

BY:

Job # (25384B4) Invoice # 35437B5 Claim #

Case: Hansen v. Roberts
Witness: Heidi Michelsen-Jost, MD
Date: 10/11/2010 4:30:00 PM

Charges:

Transcript Fee for Overnight Delivery	\$8.50	57	\$484.50
Attendance Fee 4:30 - 6:20 p.m.	\$130.00	1	\$130.00
Exhibits Attached to Transcript	\$0.25	98	\$24.50
6% sales tax	\$1.47	1	\$1.47
Signature waived	\$0.00	1	\$0.00
Shipping & Handling - Overnight Delivery	\$30.00	1	\$30.00

Sub Total	\$670.47
Payments	\$0.00
Balance Due	\$670.47

We appreciate your business!

(Return this section with check)

Billed to: Jennifer K. Brizee
Invoice # 35437B5
Billed: #####
Amount Due: \$670.47

SOUTHERN OFFICE

421 W. Franklin Street
P.O. Box 2636 Boise, ID 83701-2636
208-345-9611 208-345-8800 (fax)
1-800-234-9611
email m-and-m@qwestoffice.net

NORTHERN OFFICE

816 E. Sherman Ave, Ste. 7
Coeur d'Alene, ID 83814-4921
208-765-1700 208-765-8097 (fax)
1-800-879-1700
email csmith@mmcourt.com

Remit Payment [X]

Remit Payment []

359

GO-FER IT EXPRESS
DELIVERY SERVICE

P.O. Box 388
Twin Falls, ID 83303-0388
(208) 733-2036 • 1-800-230-2036

DATE 9/29/10

FREIGHT CHARGES		
THIRD PARTY <input type="checkbox"/>	PREPAID <input checked="" type="checkbox"/>	COLLECT <input type="checkbox"/>

1546126

THIRD PARTY BILLING:	ADDRESS	CITY	STATE	ZIP	PIECES	DESCRIPTION OF COMMODITIES	WEIGHT/LBS.	RUSH <input type="checkbox"/>	FREIGHT CHARGES	C.O.D.	
					1	ENV			DELAY FEE		
						DIMENSIONS X X			C.O.D. FEE		
									VALUATION FEE		
								TOTAL	17.00	\$ COLLECT CASH ONLY <input type="checkbox"/>	
					X SHIPPER'S SIGNATURE	SHIPPER'S P.O. NUMBER	DECLARED VALUE	FREIGHT PAYMENT	CASH <input type="checkbox"/>	CASH <input type="checkbox"/>	
								CHECK # <u>1564</u>	CHECK #		
					FROM: <u>Jennifer Bruce</u>	PHONE #	TO: <u>James Brodbeck, M.D.</u>	PHONE #			
					ADDRESS <u>PO Box 1270</u>		ADDRESS <u>Wood River Medical Center</u>				
					CITY <u>Twin Falls</u> STATE <u>ID</u> ZIP <u>83301</u>		CITY <u>Wood River</u> STATE <u>OR</u> ZIP <u>97140</u>				
					P/U DRIVER <u>TB</u> DATE <u>9-29</u> TIME <u>11:15</u> A.M./P.M.	PRINT LAST NAME	SIGNATURE				
					DEL DRIVER DATE TIME A.M./P.M.			X RECEIVED IN GOOD CONDITION EXCEPT AS NOTED			



Fastest Way
Same Day

CLAIMS FOR SHORTAGE OR DAMAGE MUST BE FILED WITHIN 7 DAYS OF DATE OF DELIVERY AND ACCOMPANIED BY THIS FREIGHT BILL. SHIPMENT IS RELEASED FOR A VALUE NOT TO EXCEED \$50.00 UNLESS GREATER VALUE IS INDICATED IN VALUATION BOX ABOVE. A COST OF 50¢ PER \$100.00 WILL BE ADDED FOR VALUE ABOVE \$50.00, NOT TO EXCEED \$10,000. 1.5% INTEREST ON PAST DUE BILLS.

SHIPPER'S COPY

Allied | Roberts | Hansen

605

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			[REDACTED]			
			claims representative. This is a required attorney function since she is the only one with the personal knowledge to perform this task.	175.00	0.20	35.00
JKB	L410	A101	Plan and prepare for cross examination of Mr. Hansen,			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	6.80	1,190.00
JKB	L410	A104	Review defense exhibits (final) to insure all exhibits, including voluminous new medical records, have been included, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.			
				175.00	2.10	367.50
10/17/2010						
JKB	L420	A104	Review of transcript of approved deposition testimony of Dr. Jost,			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she			

282

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L410	A101	is the only one with the personal and legal knowledge to perform this task. Plan and prepare for direct examination of Officer Hermosilla (complete and finalize)	175.00	3.60	630.00
JKB	L420	A101	Plan and prepare for direct examination of John Droge, expert witness, biomechanical engineer (continue)	175.00	2.10	367.50
JKB	L440	A101	Plan and prepare for (continue and complete) opening statement to jury	175.00	1.60	280.00
JKB	L440	A104	Review juror pool list from clerk,	175.00	0.90	157.50
JKB	L440	A101	Plan and prepare for jury voire dire, questions to ask jury as panel,	175.00	1.80	315.00

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L420	A104	function as she is the only individual authorized to perform this task. Review responsive e-mail correspondence	175.00	0.20	35.00
JKB	L420	A103	This is a required attorney function as she is the only individual authorized to perform this task. Draft e-mail correspondence to	175.00	0.10	17.50
JKB	L420	A104	This is a required attorney function as she is the only individual authorized to perform this task. Review e-mail correspondence	175.00	0.10	17.50
JKB	L420	A103	This is a required attorney function as she is the only individual authorized to perform this task. Draft e-mail correspondence	175.00	0.20	35.00
JKB	L420	A101	This is a required attorney function as she is the only individual authorized to perform this task. Plan and prepare for direct examination of Scott Kimbrough (continue),	175.00	0.10	17.50
			This is a required attorney function since she is the only one authorized to perform this task.	175.00	1.20	210.00

10/18/2010
DGA L430 A104

Review/analyze plaintiff's motion in limine/objection to opening

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			Rate	Hours	
		statement to determine the legal issues presented in preparation for drafting defendant's memorandum in opposition to said motion, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevant legal issues regarding the motion in limine.	150.00	0.30	45.00
DGA	L430	A102			
		Research Idaho law to determine the legal parameters regarding permissible statements during opening statement of trial in preparation for drafting defendant's memorandum in opposition to plaintiff's motion in limine seeking to limit defendant's opening statement, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevant legal issues relating to the motion in limine.	150.00	0.80	120.00
DGA	L430	A104			
		Review/Analyze Idaho Rule of Evidence 704 and related Idaho case law regarding expert witness testimony, [REDACTED]			
		as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevant legal issues pertaining to the motion in limine.	150.00	0.80	120.00
DGA	L430	A103			
		Draft defendant's memorandum in opposition to plaintiff's motion in limine/objection to opening statement, and specifically, legal			

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				Rate	Hours	
JKB	L320	A107	<p>argument that defendant's expert witnesses do not testify or opine regarding an ultimate issue to be embraced by the trier of fact and defendant may properly reference and solicit expert testimony regarding causation of the accident and outline said evidence during opening statement, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to analyze and draft the relevant legal issues relating to plaintiff's motion in limine. Communicate (other outside counsel) via telephone conference from [REDACTED]</p>	150.00	2.50	375.00
JKB	L420	A104	<p>[REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task. Review e-mail correspondence [REDACTED]</p>	175.00	0.40	70.00
JKB	L420	A104	<p>[REDACTED] This is a required attorney function as she is the only individual authorized to perform this task. Review e-mail correspondence from [REDACTED]</p>	175.00	0.10	17.50
JKB	L420	A108	<p>[REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task. Communicate (other external) via telephone conference with [REDACTED]</p>	175.00	0.20	35.00

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				Rate	Hours	
			preparation for hearing on plaintiff's motion in limine/objection to opening statement filed this morning, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task.			
JKB	L320	A104	Review multi-page [REDACTED]	175.00	1.50	262.50
			[REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task.			
DGA	L430	A103	Draft Affidavit of Douglas G. Abenroth in Support of Defendant's Memorandum in Support of Plaintiff's Motion in Limine/Objection to Opening Statement, as authorized by the file handler. This is a required attorney function, as he is the only one with the personal knowledge to perform this task.	175.00	0.50	87.50
JG	L420	A103	Draft e-mail to John Droge, provide new medical records from Dr. Mills, request review, as authorized by the file handler.	150.00	0.20	30.00
JG	L420	A103	Draft log of excerpts from Dr. Jost's approved deposition transcript to be read at trial as required by the court and as authorized by the file handler, to submit to court, as required by Idaho Rules of Civil Procedure for all instances where approved deposition testimony is to be read to jury, versus live testimony.	95.00	0.10	9.50
				95.00	0.20	19.00
10/19/2010						
JKB	L450	A109	Attend trial of this matter, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	9.00	1,575.00
JKB	L410	A109	Attend lengthy meeting with Matt			

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				Rate	Hours	
			Roberts [REDACTED]			
			[REDACTED] as authorized by the file handler. This is a required attorney function as she is the only one authorized to engage in such discussions and participate in such discussions, and determine course of action and whether to continue trial of this matter.	175.00	1.10	192.50
JKB	L430	A107	Communicate (other outside counsel) via telephone call to plaintiff's counsel, Sky Ipsen, to provide initial information of liver transplant telephone call, discussion of need to determine best procedure, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L430	A108	Communicate (other external) via telephone call to county sheriff's department, courthouse personnel to attempt to locate judge to alert of liver transplant circumstance, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.40	70.00
JKB	L430	A103	Draft e-mail correspondence to Kimber Baumgartner, provide information of liver transplant for Matt Roberts, [REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.10	17.50
JKB	L430	A107	Communicate (other outside counsel) via telephone call to plaintiff's counsel, Brent Gordon, to			

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				Rate	Hours	
JKB	L430	A106	provide information of second phone call, liver is perfect match, need for Matt Roberts to leave trial, options for trial, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.40	70.00
			Communicate (with client) via telephone call to Matt Roberts, [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L410	A111	Work (continue) on cross-examination of plaintiff, [REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.80	140.00
JKB	L430	A106	Communicate (with client) via telephone call to Tracy Butsch, [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.10	17.50
JKB	L430	A106	Communicate (with client) via lengthy telephone conference with Grace Madona, [REDACTED]			

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				Rate	Hours	
						
			authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.40	70.00
JKB	L430	A107	Communicate (other outside counsel) via telephone call to plaintiff's counsel, inform of decision we need to ask for continuance, due to the situation of Matt Roberts now on his way to Salt Lake City for liver transplant, discussion of options, answer all questions, his response and points relative to his potential for appeal, etc., as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.			
JKB	L410	A108	Communicate (other external) via telephone call to 	175.00	0.40	70.00
						
			as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.40	70.00
JKB	L420	A108	Communicate (other external) via telephone call to 			
						
			, as authorized by the claims			

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				Rate	Hours	
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.70	122.50
JKB	L120	A108	Communicate (other external) via telephone conference with Ammon Roberts, brother of Matt Roberts, discussion of condition and status of Matt Roberts, transplant surgery process, additional testing, etc., as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.40	70.00
JG	L440	A108	Communicate (other external) via telephone call to Tracy at Mike Wheeler's office, individual who was going to serve as witness for purpose of reading Dr. Jost's approved deposition testimony into record, advising that our client received a call for a liver transplant, trial continued, as authorized by the file handler.	95.00	0.10	9.50
JKB	L420	A108	Communicate (other external) via telephone call to Scott Kimbrough, confirm continuation granted by court, no need to travel to Idaho Falls for trial today, discuss implications, need for further discussion, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
10/21/2010						
JG	L320	A108	Communicate (other external) via telephone call from Donna at Emerg-A-Care advising the medical records have finally arrive, discuss confirmation need due to trial continuance, as authorized by the file handler.	95.00	0.10	9.50
JKB	L320	A103	Draft letter to Sky Ispen, per attorney agreement, regarding			

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					Rate	Hours	
				medical records we received from Emerg-A-Care, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
10/25/2010	JKB	L430	A104	Review minute entry from Judge Anderson, relative to pre-trial motions, to confirm accuracy, determine whether follow-up required, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
	JKB	L430	A104	Review memo/letter from plaintiff's counsel, Brent Bourdon, discussion of his opinions relative to appellate issues, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for the defense of this matter and must be aware of such matter in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
10/26/2010	JKB	L320	A104	Review numerous EmergACare records related to plaintiff to determine whether any further defense for continued trial of this matter, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.40	70.00
	JKB	L250	A104	Review order from court related to			

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				Rate	Hours	
			plaintiff's motion in limine to preclude evidence of traffic citation issued against plaintiff by police officer, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
JKB	L250	A104	Review order related to defendant's motions in limine to insure accuracy with verbal orders from court, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
JKB	L250	A104	Review order related to defendant's motion for plaintiff to be compelled to sign releases to obtain unemployment and workers' compensation records, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
JKB	L250	A108	Communicate (other external) via telephone conference with Ammon Roberts, brother of insured, Matt Roberts, to obtain status update relative to liver transplant surgery, determine restrictions by physicians, etc. in order to better be able to determine potential for trial continuance in this matter, as authorized by the claims representative. This is a required	175.00	0.10	17.50

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				Rate	Hours	
			attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L250	A103	Draft letter to Kimber Baumgartner, provide information of court's Minute Entry on Pre-Trial Conference, Order (re: Plaintiff's First Motion in Limine); Order Requiring Plaintiff to Sign Releases for Wyoming Dept. of Employment, Wyoming Dept. of Family Services, and Rudd & Company, PLLC; and Order Regarding Defendant's Motions in Limine, as authorized by the claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.10	17.50
10/27/2010	DGA	L440	A102			
			Research Idaho law to determine whether Idaho's appellate courts [REDACTED], as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevant legal issues [REDACTED]	150.00	1.70	255.00
DGA	L440	A102	Research state jurisdictions outside of Idaho to determine [REDACTED] as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevant legal issues [REDACTED]			

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				Rate	Hours	
JKB	L120	A106	<p>[REDACTED]</p> <p>Communicate (with client) via telephone conference with Kimber Baumgartner [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in this discussion.</p>	150.00	0.50	75.00
JKB	L430	A108	<p>Communicate (other external) via telephone call to Judge's chambers relative to avenue for communication of information regarding Matt Roberts' condition and planned proposal for continuing forward in this matter, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in this discussion.</p>	175.00	0.40	70.00
JKB	L430	A103	<p>Draft lengthy, multi-page, detailed letter to Judge Woodland providing information of Matt Roberts' condition, discussion of proposal for video trial deposition, and submission of same to jury, as requested by the Court, and as authorized by the file handler. This is a required attorney function as she is the only individual with the personal and legal knowledge to perform this task.</p>	175.00	0.10	17.50
JKB	L430	A104	<p>Review e-mail correspondence from Brent Gordon, response to correspondence to Judge Woodland, requesting further conference and discussion, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussions.</p>	175.00	0.70	122.50
			<p>to engage in such discussions.</p>	175.00	0.10	17.50

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				Rate	Hours	
11/01/2010						
JKB	L440	A104	Review e-mail correspondence from plaintiff's counsel, requesting status update relative to Matt Roberts' condition, as authorized by the file handler. This is required attorney function as she is the only individual authorized to respond to the same.	175.00	0.10	17.50
JKB	L440	A104	Draft e-mail correspondence to Brent Gordon, providing information Matt Roberts has been discharged from the hospital, working on obtaining update, discuss video trial deposition option, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to respond to the same.	175.00	0.10	17.50
JKB	L440	A104	Review responsive e-mail correspondence from Brent Gordon, requesting further communication and discussion with Court of proposed video trial deposition in this matter, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to respond to the same.	175.00	0.10	17.50
11/03/2010						
JKB	L440	A108	Communicate (other external) via telephone conference with Fred Roberts, father of Matt Roberts, detailed and lengthy discussion of status of Matt Roberts, information received from physicians relative to restrictions and need to keep him healthy and away from illnesses, discussion of proposed video trial deposition, obtain opinions relative to pain levels and ability to participate in process, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussions.	175.00	0.80	140.00
JKB	L440	A106	Communicate (with client) via telephone conference with Matt			

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				Rate	Hours	
			from verbal communication with insured relative to condition, liver transplant, and willingness to travel to Salt Lake City for approved deposition, discussion of potential dates for continuance of trial, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussions.	175.00	0.20	35.00
	JKB	L410	A103			
			Draft lengthy, detailed, notice for approved deposition, trial video, of Matthew Roberts in order to preserve his trial testimony, requires specific language to insure can be played for jury at trial, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.20	35.00
11/08/2010	JKB	L410	A104			
			Review e-mail correspondence from Brent Gordon, confirming agreement to proceed with video trial approved deposition of insured, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
	JKB	L410	A103			
			Draft response e-mail correspondence to Brent Gordon, acknowledge confirmation, discussion of how best to proceed, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
11/09/2010	JKB	L230	A108			
			Communicate (other external) via telephone call from Judge Woodland's chambers, request status conference, need for discussion of trial continuance, case status, as authorized by the claims representative. This is a required			

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				Rate	Hours	
			attorney function as she is the only one authorized to engage in such discussions.			
JKB	L230	A108	Communicate (other external) via lengthy telephone call to expert witness, John Droge, discuss potential for continuance of trial, discuss implications for this case, his involvement, status of his review, etc., as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L230	A108	Communicate (other external) via detailed telephone conference with Scott Kimbrough, discuss information from judge's chambers, his ability to attend trial, continued trial, need for personal appearance for same, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.40	70.00
JKB	L230	A108	Communicate (other external) via telephone call to Judge's chambers, provide information of agreement to trial continuance, expert witness status, as requested by court, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.40	70.00
JKB	L230	A108	Communicate (other external) via telephone conference with [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L230	A103	Draft e-mail to Kimber Baumgartner, [REDACTED]	175.00	0.50	87.50

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				Rate	Hours	
			[REDACTED]			
			[REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.10	17.50
JKB	L230	A109	Attend conference call (no travel required) with Court and counsel, discussion of status of Matt Roberts, upcoming video trial approved deposition, discuss need for jury to be released or trial continued soon, discuss issue with police officer and need to appear in person, etc., as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.50	87.50
JKB	L230	A108	Communicate (other external) via telephone call to Scott Kimbrough, provide information obtained from conference call with court and counsel, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L230	A108	Communicate (other external) via telephone call to expert witness John Droge, provide information relative to testimony at trial, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.10	17.50
JKB	L230	A108	Communicate (other external) via telephone call [REDACTED]			

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				Rate	Hours	
			trial continuance necessary, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L410	A103	Draft letter to Corporal Hermosillo, requesting acceptance of service on Another Trial Subpoena for Corporal Hermosillo, need for same as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.10	17.50
JKB	L420	A103	Draft letter to Scott Kimbrough, advising of trial continuance, need for live testimony, information relative to same, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.20	35.00
JKB	L420	A103	Draft letter to expert biomechanical witness John Droge, provide information of need for appearance, per discussion with court, and continuance of trial due to liver transplant for Matt Roberts, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this	175.00	0.20	35.00

11/12/2010

JKB L410 A103

Draft e-mail to Matt Roberts

[REDACTED]

This is a required attorney function since she is the only one authorized to perform this task.

175.00 0.10 17.50

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				Rate	Hours	
	JKB	L410	A106			
			Communicate (with client) via telephone conference with Matt Roberts, [REDACTED], as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.50	87.50
11/15/2010	JG	L320	A108			
			Communicate (other external) via telephone call to Egbert Chiropractic Center inquiring if they had received the request for medical records for Larry Hansen; Erica advised she had faxed medical records on October 26, 2010; Erica said she would fax the medical records again, as authorized by the file handler.	95.00	0.10	9.50
	JKB	L320	A103			
			Draft letter to Brent Gordon, provide information medical records for plaintiff received from Egbert Chiropractic Center via the medical release, per attorney agreement, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.10	17.50
			For Current Services Rendered		79.60	13,712.00

Recapitulation

Attorney	Hours	Rate	Total
Jennifer K. Brizee	72.20	\$175.00	\$12,635.00
Douglas G. Abenroth	6.80	150.00	1,020.00
Judy Graf	0.60	95.00	57.00

10/15/2010	L320	E124	Reimbursement for Copy-It expense.	257.45
10/15/2010	L320	E124	Reimbursement for Copy-It expense.	6.36
10/15/2010	L320	E124	Reimbursement for Copy-It expense.	169.94
10/17/2010	L410	E124	Reimbursement for lodging for witness	217.08
10/18/2010	L410	E110	Out-of-town travel from Twin Falls, to Rexburg; from Rexburg to Idaho Falls, ID (247 miles at \$.50 per mile)	123.50

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10/18/2010	L410	E114	Witness fees	50.00
10/18/2010	L410	E124	Reimbursement for lodging.	164.16
10/20/2010	L450	E110	Out-of-town travel Idaho Falls to Twin Falls (185 miles at \$.50 per mile)	92.50
10/21/2010	L110	E124	Reimbursement for medical records for Larry Hansen from Emerg-A-Care.	70.00
11/15/2010	L110	E125	Photocopy charges (343 copies @ \$0.08 per copy)	27.44
			Total Expenses	1,178.43
			Total Current Work	14,890.43
			Balance Due	<u>\$50,618.57</u>

Task Code Recapitulation

L110	Fact Investigation/Development	0.00	97.44
L120	Analysis/Strategy	262.50	0.00
L100	Case Assessment, Development and Administration	262.50	97.44
L230	Court Mandated Conferences	525.00	0.00
L250	Other Written Motions and Submissions	105.00	0.00
L200	Pre-Trial Pleadings and Motions	630.00	0.00
L320	Document Production	299.00	433.75
L300	Discovery	299.00	433.75
L410	Fact Witnesses	4830.00	554.74
L420	Expert Witnesses	1848.50	0.00
L430	Written Motions and Submissions	1547.50	0.00
L440	Other Trial Preparation and Support	1949.50	0.00
L450	Trial and Hearing Attendance	2345.00	92.50
L400	Trial Preparation and Trial	12,520.50	647.24



Invoice

Date: 10/15/2010
 Invoice #: 3848

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TOLMAN & BRIZEE, PC
 PO BOX 1276
 TWIN FALLS, ID 83303

NOV 05 2010

P.O. No.
ALLIED/ROBERTS

Qty	Description	Rate	Amount
26	TAB SETUP AND DESIGN	1.00	26.00T
104	TAB COPIES BLACK AND WHITE COPIES	0.26	27.04T
192	DIVIDERS/SPECIALITY PAPERS/CARDSTOCK	0.04	7.68T
1,656	BLACK AND WHITE COPIES WITH DIVIDERD INSERTED	0.11	182.16T

PLEASE MAIL PAYMENTS TO:
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 TWIN FALLS, ID 83301

WE OFFER SCANNING & PRINTING OF BLUEPRINT DOCUMENTS, LARGE POSTERS, MAPS, EXHIBITS.

Subtotal	\$242.88
Sales Tax (6.0%)	\$14.57
Total	\$257.45
Balance Due	\$257.45

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"When Experience and Integrity Matter"

Invoice

Date: 10/15/2010
 Invoice #: 3846

"YOUR DIGITAL SCAN PRINT AND COPY CENTER"

544 BLUE LAKES BLVD N. 734-9005, FAX 734-2575

IN THE LYNWOOD SHOPPING CTR

Bill To

TOLMAN & BRIZEE, PC
 PO BOX 1276
 TWIN FALLS, ID 83303

NOV 05 2010

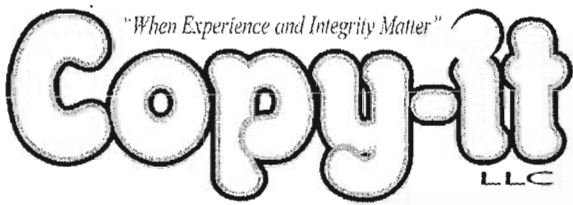
P.O. No.
LY ROBERTS

Qty	Description	Rate	Amount
2	ENGINEERING AND BLUEPRINT COPY AND/OR PRINTING SERVICES	3.00	6.00T

**PLEASE MAIL PAYMENTS TO:
 COPY-IT LLC
 544 BLUE LAKES BLVD NORTH
 TWIN FALLS, ID 83301**

**WE OFFER SCANNING & PRINTING OF BLUEPRINT
 DOCUMENTS, LARGE POSTERS, MAPS, EXHIBITS.**

Subtotal	\$6.00
Sales Tax (6.0%)	\$0.36
Total	\$6.36
Balance Due	\$6.36



Invoice

Date: 10/15/2010
 Invoice #: 3844

"YOUR DIGITAL SCAN PRINT AND COPY CENTER"
544 BLUE LAKES BLVD N. 734-9005, FAX 734-2575
IN THE LYNWOOD SHOPPING CTR

Bill To
 TOLMAN & BRIZEE, PC
 PO BOX 1276
 TWIN FALLS, ID 83303

NOV 05 2010

P.O. No.
ALLIED/ROBERT

Qty	Description	Rate	Amount
1,395	BLACK AND WHITE COPIES, WITH DIVDERS AND 3 HOLE	0.11	153.45T
63	SPECIALITY PAPERS/CARDSTOCK	0.04	2.52T
15	COLOR COPIES	0.29	4.35T

PLEASE MAIL PAYMENTS TO:
COPY-IT LLC
544 BLUE LAKES BLVD NORTH
TWIN FALLS, ID 83301

WE OFFER SCANNING & PRINTING OF BLUEPRINT DOCUMENTS, LARGE POSTERS, MAPS, EXHIBITS.

Subtotal	\$160.32
Sales Tax (6.0%)	\$9.62
Total	\$169.94
Balance Due	\$169.94

**Shilo
inn
Suites Hotel**
 "Affordable Excellence"
 780 Lindsay Blvd., Idaho Falls, ID 83402
 (208) 523-0088

Roberts, Matt

Room Number: 114
Daily Rate: 78.00
Room Type: MQQ
No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
10/17/2010	10/19/2010	XXXX XXXX XXXX 2104	GOV	G	10440110934

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
10/17/2010	114	ROOM CHARGE	#114 Roberts, Matt	\$78.00
10/17/2010	114	ROOM TAX	ROOM TAX	\$1.56
10/17/2010	114	SALES TAX	SALES TAX	\$4.68
10/18/2010	114	ROOM CHARGE	#114 Roberts, Matt	\$78.00
10/18/2010	114	ROOM TAX	ROOM TAX	\$1.56
10/18/2010	114	SALES TAX	SALES TAX	\$4.68
10/19/2010	114	ROOM CHARGE	ROOM CHARGE	\$45.00
10/19/2010	114	ROOM TAX	ROOM TAX	\$0.90
10/19/2010	114	SALES TAX	SALES TAX	\$2.70
10/19/2010	114	AMERICAN EXPRESS	AMERICAN EXPRESS	(\$217.08)

TOTAL DUE: **\$0.00**

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Allied/Roberts

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 10/18/10

PLACE OF TRAVEL: Twin Falls to Rexburg to Idaho Falls (only)

PERSONAL CAR MILEAGE

Total miles 247 at \$.50 \$ 123.50

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 123.50



Shilo Inn
Suites Hotel
 "Affordable Excellence"
 780 Lindsay Blvd., Idaho Falls, ID 83402
 (208) 523-0088

Brizee, Jennifer
 ID NATIONAL LABORATORY

Room Number: 229
 Daily Rate: 76.00
 Room Type: FKS
 No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
10/18/2010	10/20/2010	XXXX XXXX XXXX 2104	GOV	G	10440110935

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
10/18/2010	229	ROOM CHARGE	#229 Brizee, Jennifer	\$76.00
10/18/2010	229	ROOM TAX	ROOM TAX	\$1.52
10/18/2010	229	SALES TAX	SALES TAX	\$4.56
10/19/2010	229	ROOM CHARGE	#229 Brizee, Jennifer	\$76.00
10/19/2010	229	ROOM TAX	ROOM TAX	\$1.52
10/19/2010	229	SALES TAX	SALES TAX	\$4.56
10/20/2010	229	AMERICAN EXPRESS	AMERICAN EXPRESS	(\$164.16)

TOTAL DUE: \$0.00

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES.

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

✓ CASE: Allied / Roberts

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 10/20/10

PLACE OF TRAVEL: Idaho Falls to TF (one way only)

PERSONAL CAR MILEAGE

Total miles 185 at \$.50 \$ 92.50

Miscellaneous \$ _____

Other \$ _____

Explanation: _____

TOTAL \$ 92.50

EMERG A-CARE
902 N BROADWAY
JACKSON NJ 08901
307-733-6002

DATE: 10/18/10 TIME: 15:40:55
REF: 000011495 STR: 0001 TERM: 0001
SALES DRAFT

REF: 0007 BATCH: 550
CD TYPE: AX TR TYPE: NY

TOTAL \$70.05K

AMT: *****2104 EXP: N/A
BY: 10023
AVC REG: N

I AGREE TO PAY ABOVE TOTAL AMOUNT
ACCORDING TO CARD ISSUER AGREEMENT
(MERCHANT AGREEMENT IF CREDIT VOUCHER)

TOP COPY MERCHANT BOTTOM COPY CUSTOMER

DATE: 10/18/2010 TIME: _____

MESSAGE FAXED TO #: (307) 733-0032

PLEASE DELIVER TO: Emerg-A-Care Attention: Donna -Medical Records

MESSAGE FROM: Judy Graf for Jennifer K. Brizee

NO. OF PAGES TO FOLLOW: 2

COMMENTS: RE: Hansen v. Roberts

Second Request re: letter dated 9-16-10 (2 pgs.)

Donna, the last I heard you were in the process of retrieving records from storage and you said you would call when you received them.

Have you received the records yet?

HARD COPY WILL NOT FOLLOW.

If you do not receive the number of pages indicated above, please call (208) 733-5566 as soon as possible.

IMPORTANT: This communication is intended solely for the use of the individual or entity to which it is addressed. It contains information that is confidential and/or privileged. If you are not responsible for delivering this communication to the intended recipient, you are hereby notified that the disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via regular postal service. Thank you.

Allied Roberts Hans

TOLMAN & BRIZEE, P.C.

City of Rexburg
Gen & Admin.:Witness Expense

Allied/Roberts/Hansen

10/18/2010

15678

50.00

Checking

Witness Fee

50.00

Powers Tolman, PLLC
 Twin Falls Office
 132 3rd Avenue East
 P.O. Box 1276
 Twin Falls, Idaho 83303-1276
 (208) 733-5566

TAX ID. No. 27-1339414

Allied Group Insurance
 P.O. Box 2238
 Portland OR 97208-2238

Page: 1
 December 21, 2010
 Account No: 8000-327M
 Statement No: 16

Attn: Kimber Baumgartner

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Previous Balance			\$50,618.57
					Rate	Hours	
11/17/2010	JG	L320	A108	Communicate (other external) via telephone call from Courtney at Rigby Community Care advising Larry Hansen is not a patient of theirs, in response to request for records, as authorized by the file handler.	95.00	0.10	9.50
	JKB	L410	A104	Review e-mail correspondence from Matt Roberts, [REDACTED]			
	JKB	L410	A103	[REDACTED] This is a required attorney function as she is the only individual authorized to perform this task. Draft e-mail correspondence to Matt Roberts, [REDACTED]	175.00	0.20	35.00
				[REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task	175.00	0.10	17.50
11/18/2010	JG	L410	A103	Draft e-mail to Matt Roberts, [REDACTED]			
	JKB	L410	A106	[REDACTED] as authorized by the file handler. Communicate (with client) via	95.00	0.10	9.50

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours		
			lengthy telephone conference with Matt Roberts, [REDACTED] [REDACTED] [REDACTED] [REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to prepare the insured/party for trial testimony in this matter.	175.00	1.30	227.50	
JKB	L410	A103	Draft (continue and finalize) [REDACTED] [REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to question the insured for trial testimony.	175.00	0.30	52.50	
11/19/2010	JKB	L410	A109	Attend meeting with Matt Roberts in person in Salt Lake City, Utah, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to prepare a party for his trial testimony.	175.00	1.50	262.50
JKB	L410	A109	Attend video trial testimony of Matt Roberts, in Salt Lake City, including direct examination, cross examination, redirect, re-cross and second redirect, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to attend trial and perform direct, redirect, and second redirect relative to the insured	175.00	2.00	350.00	

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
	JKB	L410	A109			Attend meeting with Matt Roberts in Salt Lake City after trial testimony, [REDACTED] authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussions, and the only one with the personal and legal knowledge to provide such evaluation and information to the insured.
				175.00	0.80	140.00
	JKB	L410	A111			Travel to Salt Lake City, Utah, to attend approved trial testimony of insured Matt Roberts, due to this inability to attend trial in this matter because of recent liver transplant, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to prepare a party for his trial testimony.
				175.00	6.80	1,190.00
11/22/2010	JKB	L320	A104			Review correspondence from Dr. Ryan Hammar, providing information plaintiff was not a patient at that facility, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.
				175.00	0.10	17.50
11/29/2010	JKB	L410	A103			Draft letter to Matthew Roberts, [REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to


Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			perform this task.	175.00	0.20	35.00
12/02/2010	JKB	L410	A104			
			Review lengthy, multi-page transcript of trial video testimony of Matthew Roberts, in order to determine areas would like to be stricken, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	1.80	315.00
	JKB	L430	A103			
			Draft Defendant's Motion to Strike Portion of Matthew Roberts' Video Trial Testimony, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.20	35.00
	JKB	L430	A103			
			Draft (begin) multi-page, detailed Memorandum in Support of Defendant's Motion to Strike Portion of Matthew Roberts' Video Trial Testimony, including expansion of arguments supportive of objections in this matter, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	1.20	210.00
	JKB	L430	A103			
			Draft Affidavit of Jennifer K. Brizee in Support of Defendant's Motion to Strike Portion of Matthew Roberts' Video Trial Testimony, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.20	35.00
	JKB	L430	A108			
			Communicate (other external) via telephone call from Judge Woodland, discussion of new information of juror unable to attend new trial date, discuss options			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L430	A103	relative to same, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions. Draft e-mail to Kimber Baumgartner [REDACTED]	175.00	0.20	35.00
JKB	L430	A108	authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions. Communicate (other external) via telephone call to jury commissioner to obtain additional information relative to juror who cannot attend continued trial in order to obtain information necessary to make a decision relative to whether to proceed or not as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.10	17.50
JKB	L430	A103	Draft e-mail correspondence (second e-mail) to Kimber Baumgartner [REDACTED] authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.10	17.50
JKB	L430	A104	Review responsive e-mail from Kimber Baumgartner [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.10	17.50
JKB	L430	A106	Communicate (with client) via telephone conference with Matt Roberts. [REDACTED]	175.00	0.10	17.50

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours		
							
			authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.30	52.50	
JKB	L430	A108	Communicate (other external) via telephone call to Judge Woodland regarding approval of proceeding with 11 jurors in this matter due to juror conflict, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00	
12/03/2010	JG	L430	A108	Communicate (other external) via telephone call to Judge Woodland concerning agreement of proceeding with trial with 11 jurors; Judge Woodland advised that Brent Gordon was also in agreement with proceeding with trial with 11 jurors; Judge Woodland advised to send chamber copies of Motion to Strike Portion of Matthew Roberts' Video Trial Testimony to his home, as authorized by the file handler.	95.00	0.10	9.50
JKB	L430	A103	Draft Ex Parte Motion to Shorten Time for Motion to Strike Portion of Matthew Roberts' Video Trial Testimony, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.20	35.00	
JKB	L430	A103	Draft proposed Order Shortening Time for Motion to Strike Portion of Matthew Roberts' Video Trial Testimony, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	0.20	35.00	

Hansen v. Roberts

Insured: Matthew Roberts

Claim No.: 72 43 20 0011944

Date of Loss: 12/12/2008

				Rate	Hours		
	JKB	L430	A103	Draft (continue and finalize) Memorandum in Support of Motion to Strike Portion of Matthew Roberts' Video Trial Testimony, argument to support objections, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.80	140.00
12/06/2010	JG	L440	A108	Communicate (other external) via telephone call to Madison Memorial Hospital to inquire if they have a final signed version of the 12-12-08 ER dictated report; Anika advised she would have Branda mail to us the electronically signed version today, as authorized by the file handler.	95.00	0.10	9.50
	JKB	L430	A104	Review e-mail correspondence from Brent Gordon, relative to Motion to Strike Portions of Matthew Roberts Video Testimony in this matter, as authorized by the file handler. This is a required attorney function as she is responsible for defense of this matter and must be aware of allegations made by plaintiff's counsel relative to conduct of defense counsel.	175.00	0.10	17.50
12/07/2010	JKB	L430	A101	Plan and prepare for hearing on motion to strike portions of the trial testimony of Matt Roberts, including review of transcript portions, argument, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.40	70.00
	JKB	L430	A101	Plan and prepare for hearing on objections to jury instructions, including review of new Idaho pattern jury instructions, our objections, plaintiff's objections, special verdict form, etc., as			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	1.50	262.50
DGA	L440	A104	Review/analyze plaintiff's objections to defendant's proposed jury instructions to determine the legal issues presented and to determine whether additional legal research is necessary to support defendant's proposed jury instructions in response to plaintiff's objections, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine whether the proposed jury instructions are supported by Idaho law.			
DGA	L440	A102	Research Idaho law to determine [REDACTED] information necessary to be projected to court, in aid of hearing on jury instructions and objections with court and counsel, [REDACTED] as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine whether a negligence per se jury instruction is supported by Idaho law.	150.00	0.60	90.00
				150.00	1.70	255.00
12/08/2010	JKB	L430	A109			
			Attend hearing in Idaho Falls on motion to strike portions of video trial testimony of Matt Roberts, to properly prepare video tape for playing for jury, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			perform this task.	175.00	1.00	175.00
JKB	L430	A109	Attend jury instruction conference in Idaho Falls, hearing on objections, discussion of how to deal with jury instructions if can complete trial in one day, etc., as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.			
JKB	L430	A111	Travel to Idaho Falls for hearing on motion to strike portion of Matt Roberts' trial testimony, and for jury instruction conference, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	1.60	280.00
				175.00	6.20	1,085.00
12/09/2010						
JKB	L430	A103	Draft letter to Brent Gordon, provide substitute exhibit, electronically signed emergency room record received directly from Madison Memorial Hospital, as authorized by the claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.20	35.00
JKB	L430	A108	Communicate (other external) via telephone conference with videographer, discussion of options for redacting of video trial testimony of Matt Roberts, discuss need for trial, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L430	A103	Draft e-mail correspondence to videographer providing information of court ruling and redactions needed for trial, as authorized by the claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.20	35.00
JKB	L420	A108	Communicate (other external) via	175.00	0.20	35.00

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			telephone conference [REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	1.60	280.00
JKB	L420	A108	Communicate (other external) via lengthy, detailed, telephone conference [REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	2.20	385.00
JKB	L420	A103	Draft letter to [REDACTED]			
			[REDACTED]			
			[REDACTED] authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
12/10/2010						
JKB	L430	A108	Communicate (other external) via telephone conference with Citicourt, discussion of options for redaction of Matt Roberts' video trial testimony, logistics relative to same, impact on how will appear to jury at trial of this matter, as authorized by			



Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			the file handler. This is a required attorney function as she is the only individual authorized to engage in such discussions.			
JKB	L430	A103	Draft e-mail correspondence to Citicourt providing information of Court's order relative to redactions of video trial testimony of Matt Roberts, as authorized by the file handler. This is a required attorney function as she is the only individual authorized to perform this task.	175.00	0.40	70.00
JKB	L420	A104	Review [REDACTED]	175.00	0.20	35.00
			[REDACTED] This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.60	105.00
12/12/2010						
JKB	L440	A101	Plan and prepare for trial, work on closing argument, including outline of special verdict form, list of evidence for liability, causation, damages arguments, to provide to jury as support for our position in this matter, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and trial of this matter, and, therefore, is the only one authorized to perform this task.	175.00	3.90	682.50
JKB	L150	A103	Draft [REDACTED]	175.00	0.40	70.00
JKB	L150	A103	[REDACTED] This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.40	70.00
JKB	L150	A103	Draft letter to Kimber Baumgartner,			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			[REDACTED] as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	0.10	17.50
12/13/2010	JKB	L440 A108	Communicate (other external) via telephone conference with court reporter, discuss need for transcript of trial testimony of Larry Hansen, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
	JKB	L440 A108	Communicate (other external) via telephone conference with judge's law clerk, discuss special verdict form, additional change, to clarify proximate cause question relative to Matt Roberts, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
	JKB	L440 A103	Draft e-mail correspondence to courtroom clerk, requesting clarification relative to exhibits admitted already, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.10	17.50
	JKB	L440 A101	Plan and prepare power point presentation to provide to jury during closing, delineation of important trial testimony, etc., as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and trial of this matter, and, therefore, is the only one authorized to perform this task.	175.00	3.30	577.50
	JKB	L420 A108	Communicate (other external) via lengthy telephone conference with [REDACTED]			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			of trial transcript as discussed earlier, as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.			
JKB	L410	A104	Review trial transcript of Larry Hansen's testimony, in preparation for trial, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and trial of this matter, and, therefore, is the only one authorized to perform this task.	175.00	0.10	17.50
JKB	L410	A101	Plan and prepare for trial, continue work on cross-examination of plaintiff, refine due to rulings from court during trial and first phase of cross-examination, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and trial of this matter, and, therefore, is the only one authorized to perform this task.	175.00	1.20	210.00
JKB	L410	A108	Communicate (other external) via lengthy telephone conference  	175.00	2.40	420.00
			authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.			
JG	L440	A104	Review DVD containing Matthew Roberts' video trial testimony to ensure everything is edited out as Jennifer instructed Ryan at Citicourt to edit out and that there is nothing wrong with the DVD, which is to be played in court at trial, as authorized by the file handler.	175.00	0.50	87.50
DGA	L440	A104	Review/analyze (continue) Idaho case law and the relevant factual	95.00	0.70	66.50

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

Rate Hours

and legal issues regarding the
admissibility of a traffic citation in a
civil litigation proceedings

[REDACTED]

as authorized by the claims
representative. This is a required
attorney function as the attorney is
the individual with the knowledge
required to determine the relevant
legal issues regarding the motion in
limine.

150.00 0.90 135.00

12/14/2010

JKB L440 A104

Review medical records from five
other falls, determine approach to
providing information to jurors,
whether through cross examination
of plaintiff or through expert witness,
as authorized by the claims
representative. This is a required
attorney function since she is the
individual responsible for defense of
this matter and must be aware of
such matters in order to properly
prepare the defense of this matter
and/or determine appropriate
follow-up required.

175.00 0.70 122.50

JKB L420 A108

Communicate (other external) via
telephone conference with

[REDACTED]

as authorized by the claims
representative. This is a required
attorney function as she is the only
one authorized to engage in such
discussions.

175.00 0.40 70.00

JKB L450 A111

Travel to Idaho Falls to attend trial

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours		
			in this matter, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and the trial attorney.	175.00	3.00	525.00	
JKB	L450	A101	Plan and prepare for trial, final review of order of evidence, jury instructions, closing argument, etc. to insure all evidence necessary for burden is presented, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and the trial attorney.	175.00	2.80	490.00	
JKB	L440	A106	Communicate (with client) via telephone conference with Kimber Baumgartner [REDACTED] authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.30	52.50	
12/15/2010	JKB	L450	A109	Attend trial in this matter in Idaho Falls, Idaho, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and the only individual who can attend trial.	175.00	11.50	2,012.50
	JKB	L440	A103	Draft email correspondence to Kimber Baumgartner [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.10	17.50
	JKB	L440	A108	Communicate (other external) via lengthy telephone conference with [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

			in such discussions.	Rate	Hours	
JKB	L440	A108	Communicate (other external) via detailed, lengthy telephone conference	175.00	0.40	70.00
			[REDACTED]			
			[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.30	52.50
			For Current Services Rendered		74.90	12,939.50

Recapitulation

<u>Attorney</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jennifer K. Brizee	70.60	\$175.00	\$12,355.00
Douglas G. Abenroth	3.20	150.00	480.00
Judy Graf	1.10	95.00	104.50

11/19/2010	L410	E110	Out-of-town travel to/from Salt Lake City (484 miles at \$.50 per mile)		242.00
12/08/2010	L430	E110	Out-of-town travel to/from Idaho Falls (370 miles at \$.50 per mile)		185.00
12/09/2010	L440	E107	Reimbursement for Fed-Ex delivery. This cost was incurred as the most expeditious way to send Scott Kimbrough, expert witness, materials for review in preparation for trial, as authorized by the claims representative.		25.51
12/09/2010	L440	E107	Reimbursement for Fed-Ex delivery. This cost was incurred as the most expeditious way to receive Matt Robert's video trial deposition, as authorized by the claims representative.		26.87
12/10/2010	L130	E118	Reimbursement for Litigation support fee from Ataraxis Accounting.		100.00
12/14/2010	L450	E110	Out-of-town travel to/from Idaho Falls (370 miles at \$.50 per mile)		185.00
12/14/2010	L450	E124	Reimbursement for lodging		285.81
12/15/2010	L110	E101	Photocopies (325 copies @ \$0.06 per copy)		37.50
			Total Expenses		1,087.69
11/24/2010	L330	E115	Deposition transcripts of Mathew Roberts		363.25
11/29/2010	L330	E115	Reimbursement for Videotaped deposition of Matthew Roberts		155.81
12/09/2010	L330	E115	Videotaped deposition of Matthew Roberts (video editing)		75.00
			Total Advances		594.06

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

	Total Current Work	14,621.25
12/13/2010	PAYMENT RECEIVED - THANK YOU!	-6,659.67
12/13/2010	PAYMENT RECEIVED - THANK YOU!	-28,911.97
12/13/2010	PAYMENT RECEIVED - THANK YOU!	-14,673.35
	Total Payments	-50,244.99
	Balance Due	<u>\$14,994.83</u>

Task Code Recapitulation

L110	Fact Investigation/Development	0.00	37.50
L130	Experts/Consultants	0.00	100.00
L150	Budgeting	87.50	0.00
L100	Case Assessment, Development and Administration	87.50	137.50
L320	Document Production	27.00	0.00
L330	Depositions	0.00	594.06
L300	Discovery	27.00	594.06
L410	Fact Witnesses	3352.00	242.00
L420	Expert Witnesses	1417.50	0.00
L430	Written Motions and Submissions	2792.00	185.00
L440	Other Trial Preparation and Support	2236.00	52.38
L450	Trial and Hearing Attendance	3027.50	470.81
L400	Trial Preparation and Trial	12,825.00	950.19

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

✓ CASE: Allied / Roberts (Hansen v.)

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 12/19/10

PLACE OF TRAVEL: Salt Lake City

PERSONAL CAR MILEAGE

Total miles 484 at \$.50 \$ 242.00

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 242.00

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Allied / Roberts

FILE NO: _____

ATTORNEY: JUB

DATE OF TRAVEL: 12-8-10

PLACE OF TRAVEL: Idaho Falls

PERSONAL CAR MILEAGE

Total miles 370 at \$.50 \$ 185.00

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 185.00



FedEx Billing Online Plus

FedEx Billing Online Plus
Express Tracking ID Detail

Tracking ID Summary

Tracking ID Number :	872962975327	
Invoice Number :	7-328-49264	Distance Based Pricing, Zone 3
Account Number :	1741-0599-5	The Earned Discount for this ship
Invoice Date :	12/16/2010	Fuel Surcharge - FedEx has applied
Due Date :	12/31/2010	
Tracking ID Balance Due :	\$ 25.51	
Invoice Status :	Open	

Sender Information

JENNIFER BRIZEE
 POWERS TOLMAN, PLLC
 132 3RD AVE E
 TWIN FALLS ID 83301-6202
 US

Recipient Information

SCOTT KIMBROUGH
 MRA FORENSIC SCIENCES
 125 WEST BURTON AVE
 SALT LAKE CITY, UT 84115
 US

Original Reference

Customer Reference# ROBERTS/HANSE
 Department#
 RMA#
 Reference #2
 Reference #3

Updated Reference

Customer Reference#
 Department#
 Reference #2
 Reference #3

Shipment Details

Shipment Date 12/09/2010
 Payment Type Shipper
 Service Type FedEx Priority Overnight
 Region Code 03
 Package Type FedEx Envelope
 Pieces 1
 Rated Weight 0.0 lbs
 Meter No
 Declared Value 0.00

Charges

Transportation Charge 20.20
 Fuel Surcharge 2.32
 Courier Pickup Charge 4.00
 Weekday Delivery 0.00
 Earned Discount -1.01
 Total Charges USD \$ 25.51

Proof of Delivery

Delivery Date 12/10/2010 09:27
 Service Area Code A1
 Signed By .RICHARDSON



FedEx Billing Online Plus

FedEx Billing Online Plus
Express Tracking ID Detail

Tracking ID Summary

Tracking ID Number :	794201465698	
Invoice Number :	7-328-49264	Distance Based Pricing, Zone 3
Account Number :	1741-0599-5	The Earned Discount for this ship
Invoice Date :	12/16/2010	Fuel Surcharge - FedEx has applied
Due Date :	12/31/2010	
Tracking ID Balance Due :	\$ 26.87	
Invoice Status :	Open	

Sender Information

Ali Moll
CitiCourt

170 South Main Street
SALT LAKE CITY UT 84101
US

Recipient Information

Jennifer Brizee
POWERS TOLMAN, PLLC
132 3rd Avenue East

TWIN FALLS , ID 83303
US

Original Reference

Customer Reference# Roberts Deposition
Department#
RMA#
Reference #2
Reference #3

Updated Reference

Customer Reference#
Department#
Reference #2
Reference #3

Shipment Details

Shipment Date	12/09/2010
Payment Type	Recipient
Service Type	FedEx Priority Overnight
Region Code	03
Package Type	FedEx Pak
Pieces	1
Rated Weight	1.0 lbs
Meter No	1733256
Declared Value	0.00

Charges

Transportation Charge	27.15
Fuel Surcharge	2.44
Weekday Delivery	0.00
Earned Discount	-1.36
Automation Bonus Discount	-1.36
Total Charges	USD \$ 26.87

Proof of Delivery

Delivery Date	12/10/2010 11:07
Service Area Code	AM
Signed By	A.ANGULO

ATARAIS

ACCOUNTING

P.O. Box 1292 * 864 Filer Avenue
 Twin Falls, ID 83303
 Phone (208) 733-4730 * Fax (208) 733-4737

www.idahocpa.com

RECEIVED
 DEC 07 2010

Tolman & Brizee PC
 PO Box 1276
 Twin Falls, ID 83303-1276

BY:

Invoice No.: 411039706
 Date: 11/25/2010

Client No.: 00733
 Due Date: 12/10/10

For professional services rendered:

10/12/2010	Litigation Support Services	Braga	0.50	\$	<u>100.00</u>
	Help Jennifer review tax returns on Powers Roberts				
		Current Amount Due			100.00
		Prior Balance			<u>0.00</u>
		Total Amount Due		\$	<u><u>100.00</u></u>

0 - 30	31 - 60	61 - 90	91 - 120	Over 120	Balance
100.00	0.00	0.00	0.00	0.00	100.00

You can pay using your VISA, Mastercard, Discover, or American Express. A finance charge of 1 1/2% (annual percentage rate of 18%) or a maximum allowed by law will be charged on all accounts 30 days past due.

We guarantee our service -- if you are not delighted, let us know.

100

Allied/Roberts/Hansen

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

✓

CASE: Allied / Roberts

FILE NO: _____

ATTORNEY: JWB

DATE OF TRAVEL: 12/14/10

PLACE OF TRAVEL: Idaho Falls

PERSONAL CAR MILEAGE

Total miles 370 at \$.50 \$ 185.00

Miscellaneous \$ _____

Other..... \$ _____

Explanation: _____

TOTAL \$ 185.00



Brizee, Jennifer
 Tolman Law Office
 Twin Falls, ID 83301 US

Room Number: 433
 Daily Rate: 112.46
 Room Type: MQQV
 No. of Guests: 1 / 0

ARRIVAL	DEPARTURE	CREDIT CARD	RATE PLAN	CATEGORY	ACCOUNT
12/14/2010	12/17/2010	XXXX XXXX XXXX 2104	COMML	E	10440115059

DATE	ROOM NO.	DESCRIPTION	REFERENCE	AMOUNT
12/14/2010	433	ROOM CHARGE	#433 Brizee, Jennifer	\$112.46
12/14/2010	433	ROOM TAX	ROOM TAX	\$2.25
12/14/2010	433	SALES TAX	SALES TAX	\$6.75
12/15/2010	433	RESTAURANT CHARGE	30020	\$36.53
12/15/2010	433	ROOM CHARGE	#433 Brizee, Jennifer	\$112.46
12/15/2010	433	ROOM TAX	ROOM TAX	\$2.25
12/15/2010	433	SALES TAX	SALES TAX	\$6.75
12/16/2010	433	SHILO WATER	SHILO WATER	\$6.00
12/16/2010	433	SALES TAX	SALES TAX	\$0.36
12/16/2010	433	AMERICAN EXPRESS	AMERICAN EXPRESS	(\$285.81)

TOTAL DUE: \$0.00

Signature: _____

TERMS: DUE AND PAYABLE UPON PRESENTATION. I AGREE THAT MY LIABILITY FOR THIS BILL IS NOT WAIVED AND AGREE TO BE HELD PERSONALLY LIABLE IN THE EVENT THAT THE INDICATED PERSON, COMPANY OR ASSOCIATION FAILS TO PAY FOR ANY PART OR THE FULL AMOUNT OF THESE CHARGES

492

INVOICE



CITICOURT
THE REPORTING GROUP

170 South Main Street, Suite 300, Salt Lake City, UT 84101
TOLL FREE: 877.532.3441 PH: 801.532.3441 FAX: 801.532.3414

Jennifer Brizee
Tolman Law Office
132 3rd Avenue East
Twin Falls, ID 83303

Invoice No.	Invoice Date	Job No.
45107	12/9/2010	29455
Job Date	Case No.	
11/19/2010	CV-09-3163	
Case Name		
Hansen vs. Roberts		
Payment Terms		
Net 30, 1.5% per month plus fees *		

Videotaped Deposition of:

Matthew Roberts

Video Editing

FedEx Overnight Air

75.00

0.00

TOTAL DUE >>>

\$75.00

Thank you for using CitiCourt.

*When paid by credit card add 3% surcharge

Allied / Roberts / Hansen

Tax ID: 87-0661285

Phone: 208-733.5566 Fax: 208-733.5444

Please detach bottom portion and return with payment.

Jennifer Brizee
Tolman Law Office
132 3rd Avenue East
Twin Falls, ID 83303

Job No. : 29455 BU ID : 1-CITI
Case No. : CV-09-3163
Case Name : Hansen vs. Roberts

Invoice No. : 45107 Invoice Date : 12/9/2010
Total Due : \$ 75.00

Remit To: **CitiCourt, LLC**
170 South Main, Suite 300
Salt Lake City, UT 84101

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____

Card Number: _____

Exp. Date: _____ Phone#: _____

Billing Address: _____ 423

Zip: _____ Card Security Code: _____

Amount to Charge: _____

INVOICE



CITICOURT
THE REPORTING GROUP

170 South Main Street, Suite 300, Salt Lake City, UT 84101
TOLL FREE: 877.532.3441 PH: 801.532.3441 FAX: 801.532.3414

Jennifer Brizee
Tolman Law Office
132 3rd Avenue East
Twin Falls, ID 83303

Invoice No.	Invoice Date	Job No.
44682	11/24/2010	29454
Job Date	Case No.	
11/19/2010	CV-09-3163	
Case Name		
Hansen vs. Roberts		
Payment Terms		
Net 30, 1.5% per month plus fees *		

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Matthew Roberts	275.75
Half Day Appearance Fee	75.00
Shipping/Delivery	12.50

TOTAL DUE >>> \$363.25

COMPLIMENTARY CONDENSED TRANSCRIPT
Thank you for using CitiCourt.

*When paid by credit card add 3% surcharge

RECEIVED
NOV 29 2010

BY:.....

Tax ID: 87-0661285

Phone: 208-733.5566 Fax:208-733.5444

Please detach bottom portion and return with payment.

Jennifer Brizee
Tolman Law Office
132 3rd Avenue East
Twin Falls, ID 83303

Job No. : 29454 BU ID : 1-CITI
Case No. : CV-09-3163
Case Name : Hansen vs. Roberts

Invoice No. : 44682 Invoice Date : 11/24/2010
Total Due : \$ 363.25

Allied Roberts

Remit To: **CitiCourt, LLC**
170 South Main, Suite 300
Salt Lake City, UT 84101

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____
 Card Number: _____
 Exp. Date: _____ Phone#: _____
 Billing Address: _____
 Zip: _____ Card Security Code: _____
 Amount to Charge: _____
 Cardholder's Signature: _____

INVOICE



CITICOURT
THE REPORTING GROUP

170 South Main Street, Suite 300, Salt Lake City, UT 84101
TOLL FREE: 877.532.3441 PH: 801.532.3441 FAX: 801.532.3414

Invoice No.	Invoice Date	Job No.
44777	11/29/2010	29455
Job Date	Case No.	
11/19/2010	CV-09-3163	
Case Name		
Hansen vs. Roberts		
Payment Terms		
Net 30, 1.5% per month plus fees *		

Jennifer Brizee
Tolman Law Office
132 3rd Avenue East
Twin Falls, ID 83303

Videotaped Deposition of:

Matthew Roberts

Certified Videographer

2.00 Hours

150.00

Copy of Video on DVD

0.00

Shipping/Delivery

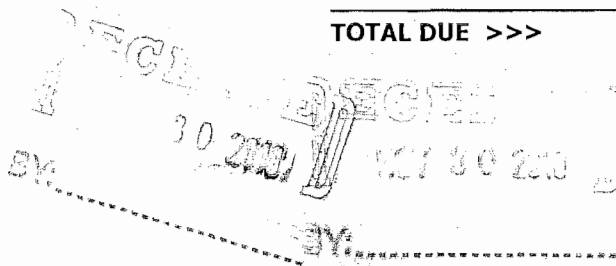
5.81

TOTAL DUE >>>

\$155.81

Thank you for using CitiCourt.

*When paid by credit card add 3% surcharge



Tax ID: 87-0661285

Phone: 208-733.5566 Fax: 208-733.5444

Please detach bottom portion and return with payment.

Jennifer Brizee
Tolman Law Office
132 3rd Avenue East
Twin Falls, ID 83303

Job No. : 29455 BU ID : 1-CITI
Case No. : CV-09-3163
Case Name : Hansen vs. Roberts

Invoice No. : 44777 Invoice Date : 11/29/2010
Total Due : \$ 155.81

Remit To: **CitiCourt, LLC**
170 South Main, Suite 300
Salt Lake City, UT 84101

PAYMENT WITH CREDIT CARD



Cardholder's Name: _____

Card Number: _____

Exp. Date: _____ Phone#: _____

Billing Address: _____ 835

Zip: _____ Card Security Code: _____

Amount to Charge: _____

Cardholder's Signature: _____

Powers Tolman, PLLC
Twin Falls Office
132 3rd Avenue East
P.O. Box 1276
Twin Falls, Idaho 83303-1276
(208) 733-5566

TAX ID. No. 27-1339414

Allied Group Insurance
P.O. Box 2238
Portland OR 97208-2238

Page: 1
January 20, 2011
Account No: 8000-327M
Statement No: 17

Attn: Kimber Baumgartner

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

			Previous Balance			\$14,994.83
				Rate	Hours	
12/16/2010						
JKB	L120	A104	Review e-mail correspondence from Kimber Baumgartner [REDACTED] [REDACTED] as authorized by the file handler. This is a required attorney function as she is the attorney responsible for defense of this matter and handled trial in this matter.	175.00	0.10	17.50
JKB	L120	A106	Communicate (with client) via lengthy telephone conference with Kimber Baumgartner [REDACTED] [REDACTED] [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.40	70.00
JKB	L450	A111	Return travel from trial in Idaho Falls, Idaho, as authorized by the file handler. This is a required attorney function as she is the only one to attend and handle trial of this matter.	175.00	3.00	525.00
JKB	L120	A106	Communicate (with client) via lengthy detailed telephone call from Matt Roberts, [REDACTED] [REDACTED]			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

					Rate	Hours	
				[REDACTED]			
				as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.80	140.00
JKB	L130	A108		Communicate (other external) via lengthy telephone conference with Scott Kimbrough, [REDACTED]			
				[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.40	70.00
12/17/2010							
JKB	L120	A108		Communicate (other external) via lengthy detailed telephone conference [REDACTED]			
				[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.80	140.00
JKB	L130	A108		Communicate (other external) via telephone conference [REDACTED]			
				[REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.30	52.50
JKB	L460	A104		Review voluminous legal bills in this matter, determine totals of various categories of costs for submission to court for reimbursement, per			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			Idaho Rules of Civil Procedure, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	1.60	280.00
JKB	L460	A103	Draft motion, Defendant's Memorandum of Costs, Disbursements and Attorney's Fees, as required by the Idaho Rules of Civil Procedure, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.40	70.00
JKB	L460	A103	Draft (begin) lengthy, multi-page Memorandum in Support of Defendant's Memorandum of Costs, Disbursements and Attorney's Fees, including argument relative to discretionary costs, lengthy argument relative to frivolous nature of this case, provide case law and rules citation to support request for costs as a matter of right, discretionary costs, attorney fees, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	2.30	402.50
JKB	L460	A103	Draft multi-page Affidavit of Jennifer K. Brizee in Support of Defendant's Memorandum of Costs, Disbursements and Attorney's Fees, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.20	35.00
12/21/2010	JKB	L460	A103	Draft letter to Kimber Baumgartner, [REDACTED] as authorized by the		

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
			claims representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.20	35.00
JKB	L460	A103	Review (continue) voluminous invoices sent to Allied Insurance for purposes of redacting attorney-client privilege information, to insure plaintiff's counsel does not have opportunity to view strategy discussions, decisions, consultants not disclosed as experts, in the instance an appeal is filed in this matter, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	1.10	192.50
JKB	L410	A103	Draft letter to Corporal Hermasillo to provide check for witness fee for his trial testimony, per requirements of witness fee rules, as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.10	17.50
12/22/2010						
JKB	L460	A104	Review (continue) voluminous legal bills to determine costs and fees, need to determine categories of same in order to determine totals for costs as a matter of right, discretionary costs, fees, per Idaho Rules of Civil Procedure, as authorized by the claims representative. This is a required attorney function since she is the only one authorized to perform this task.	175.00	1.20	210.00
JKB	L460	A103	Draft detailed, multi-page Judgment Upon Special Verdict, including information relative to specific findings of jury, to insure defenses preserved on appeal, and for post-trial motions, as authorized by the claims representative. This is a required attorney function since she			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

is the only one with the personal and legal knowledge to perform this task.

Rate Hours
175.00 0.60 105.00

12/23/2010

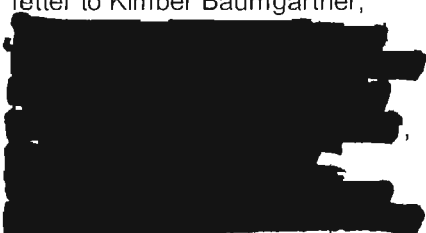
JKB L460 A104

Review (continue) legal bills to redact for attorney client information to insure plaintiff's counsel does not have information for protected as work product or as attorney-client privilege, or information relative to strategy, theories of liability, consultants to use in case matter is appealed and reversed on some ground in the future, in order, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.

175.00 2.10 367.50

12/28/2010

JKB L460 A103

Draft lengthy, detailed, multi-page letter to Kimber Baumgartner,

as authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.

175.00 1.10 192.50

01/03/2011

JKB L460 A104

Review objection to judgment submitted by plaintiff's counsel on basis he was not told of trial judge, and alternative motion to strike trial proceedings, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to


Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

			Rate	Hours	
DGA	L460	A102	175.00	0.10	17.50
		properly prepare the defense of this matter and/or determine appropriate follow-up required. Research Idaho case law to determine whether Idaho's appellate courts have analyzed Idaho Code Section 1-2005 regarding the appointment of senior judges			
		[REDACTED]			
		preparation for drafting and filing defendant's memorandum in opposition to plaintiff's objection to entry of judgment and motions to strike proceedings and disqualify the senior judge, as authorized by the claims representative. This is a require attorney function as the attorney is the individual with the knowledge required to determine the relevant law in support of defendant's memorandum in opposition to plaintiff's motions.	150.00	1.10	165.00
DGA	L460	A102			
		Research Idaho case law to determine whether Idaho's appellate courts analyzed Idaho Rule of Civil Procedure 40(d)(1) regarding the disqualification of judges without cause, and			
		[REDACTED]			
		defendant's memorandum in opposition to plaintiff's objection to entry of judgment and motions to strike proceedings and disqualify the senior judge, as authorized by the claims representative. This is a require attorney function as the attorney is the individual with the knowledge required to determine the relevant law in support of defendant's memorandum in opposition to plaintiff's motions.	150.00	1.40	210.00

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
DGA	L460	A103	Draft/revise defendant's multi-page memorandum in opposition to plaintiff's objection to entry of judgment, motion to strike trial proceedings, and motion to disqualify the senior judge assigned to preside over the present case, and specifically, the factual background section of the brief and the legal argument section of the brief concerning plaintiff's waiver and untimeliness in filing his respective motions to strike the proceedings and disqualify the judge, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevant law and facts in support of defendant's memorandum in opposition to plaintiff's motions.			
JKB	L460	A108	Communicate (other external) via telephone call [REDACTED] [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	150.00	4.40	660.00
JKB	L460	A108	Communicate (other external) via telephone call [REDACTED] [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.20	35.00
JKB	L460	A103	Draft letter to Kimber Baumgartner [REDACTED] [REDACTED]	175.00	0.70	122.50

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

Date	Initials	Case No.	Description	Rate	Hours	Total
			representative. This is a required attorney function as she is the only one with the personal knowledge to perform this task.	175.00	0.10	17.50
01/04/2011	JKB	L460 A106	Communicate (with client) via telephone call from Matt Roberts,  as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.80	140.00
01/07/2011	DGA	L460 A103	Draft multi-page affidavit of counsel in support of defendant's multi-page memorandum in opposition to plaintiff's objection to entry of judgment, motion to strike trial proceedings, and motion to disqualify the senior judge assigned to preside over the present case, as authorized by the claims representative. This is a required attorney function as the attorney is the individual with the knowledge required to determine the relevant law and facts in support of defendant's memorandum in opposition to plaintiff's motions.	150.00	0.60	90.00
01/11/2011	JKB	L460 A104	Review email correspondence from Judge Woodland stating he will not be available until after February 1, 2011, to hear post-trial motions by parties, requesting parties to determine whether acceptable, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of			

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

				Rate	Hours	
			this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
JKB	L460	A104	Review notice of hearing for plaintiff's objection to judgment, using new judge, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.			
JKB	L460	A108	Communicate (other external) via [REDACTED]	175.00	0.10	17.50
			[REDACTED], as			
			authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.40	70.00
JKB	L460	A104	Review email correspondence [REDACTED]			
			[REDACTED]			
			the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
JKB	L460	A103	Draft responsive email [REDACTED]			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours		
			[REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.10	17.50	
JKB	L460	A104	Review responsive email from [REDACTED] [REDACTED] as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50	
JKB	L460	A103	Draft letter to Kimber Baumgartner, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] authorized by the claims representative. This is a required attorney function since she is the only one with the personal and legal knowledge to perform this task.	175.00	0.10	17.50	
01/13/2011	JKB	L460	A104	Review vacation of hearing from Judge Watkin, as authorized by the claims representative. This is a required attorney function since she is the individual responsible for defense of this matter and must be aware of such matters in order to properly prepare the defense of this matter and/or determine appropriate follow-up required.	175.00	0.10	17.50
			For Current Services Rendered		27.20	4,572.50	

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

Recapitulation

<u>Attorney</u>		<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Jennifer K. Brizee		19.70	\$175.00	\$3,447.50
Douglas G. Abenroth		7.50	150.00	1,125.00
12/16/2010	L450 E110		Travel from Idaho Falls (130 miles at \$.51 per mile)	66.30
01/15/2011	L110 E101		Photocopies (841 copies @ \$0.08 per copy)	67.28
			Total Expenses	133.58
12/13/2010	L440 E116		Reimbursement for partial trial transcript testimony of Larry Hansen from Karen Konvalinka.	192.50
			Total Advances	192.50
			Total Current Work	4,898.58
12/20/2010			PAYMENT RECEIVED - THANK YOU!	-217.08
			Balance Due	<u>\$19,676.33</u>

Task Code Recapitulation

L110	Fact Investigation/Developement	0.00	67.28
L120	Analysis/Strategy	367.50	0.00
L130	Experts/Consultants	122.50	0.00
L100	Case Assessment, Development and Administration	490.00	67.28
L410	Fact Witnesses	17.50	0.00
L440	Other Trial Preparation and Support	0.00	192.50
L450	Trial and Hearing Attendance	525.00	66.30
L460	Post-Trial Motions and Submissions	3540.00	0.00
L400	Trial Preparation and Trial	4,082.50	258.80

POWERS TOLMAN, PLLC
EXPENSE REIMBURSEMENT

CASE: Allied/Roberts

FILE NO: _____

ATTORNEY: JKB

DATE OF TRAVEL: 12-16-10

PLACE OF TRAVEL: Idaho Falls (return trip)

PERSONAL CAR MILEAGE

Total miles 130 at \$.51 \$ 66.30

Miscellaneous \$ _____

Other \$ _____

Explanation: _____

TOTAL \$ 66.30

KAREN KONVALINKA, CSR 319
Official Reporter
605 N. Capital
Idaho Falls, Idaho 83402
(208) 529-1350 Ext. 1329

December 13, 2010

Jennifer K. Brizee, Esq.
POWERS TOLMAN
133 3rd Avenue East
Twin Falls, Idaho 83303-1276

Re: Larry Hansen
v. Matthew Roberts
Bonneville County CV-2009-3163

Preparation of Partial Trial
Transcript, Testimony of Larry Hansen
in the above-captioned case \$ 192.50

Thank you.

Powers Tolman, PLLC
 Twin Falls Office
 132 3rd Avenue East
 P.O. Box 1276
 Twin Falls, Idaho 83303-1276
 (208) 733-5566

TAX ID. No. 27-1339414

Allied Group Insurance
 P.O. Box 2238
 Portland OR 97208-2238

Page: 1
 February 23, 2011
 Account No: 8000-327M
 Statement No: 18

Attn: Kimber Baumgartner

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

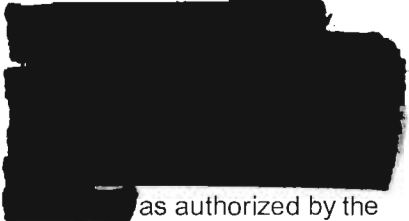
								\$19,676.33
02/17/2011				Write-off on fees for October 21, 2010 bill.				-60.50
				Previous Balance				\$19,615.83
					Rate	Hours		
01/18/2011	JKB	L420	A104	Review e-mail correspondence [REDACTED]				
				[REDACTED] as authorized by the file handler. This is a required attorney function as she is the only individual authorized to engage in such communications with expert witnesses.	175.00	0.10		17.50
01/19/2011	JKB	L420	A103	Draft e-mail correspondence [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]				
				[REDACTED] as authorized by the file handler. This is a required attorney function as she is the attorney responsible for defense of this matter and handled trial in this matter.	175.00	0.20		35.00
02/07/2011	JG	L250	A104	Review Idaho Repository website to				

Hansen v. Roberts

Insured: Matthew Roberts

Claim No.: 72 43 20 0011944

Date of Loss: 12/12/2008

					Rate	Hours	
				determine if the Judgment Upon Special Verdict has been signed by Judge Woodland; determined nothing has been filed since January 11, 2011, as authorized by the file handler.	95.00	0.10	9.50
02/09/2011	JKB	L460	A106	Communicate (with client) via telephone call from Matt Roberts,  as authorized by the claims representative. This is a required attorney function as she is the only one authorized to engage in such discussions.	175.00	0.70	122.50
02/14/2011	JKB	L460	A103	Draft responsive e-mail correspondence to Brent Gordon, discussion of whether judgment has been filed in this matter, chronology of events relative to same, as authorized by the file handler. This is a required attorney function, as she is the only individual authorized to engage in such discussions.	175.00	0.10	17.50
	JKB	L460	A103	Review e-mail correspondence from Brent Gordon, providing his chronology of events, his declining to notice up his objection to the judgment for hearing in this matter, as authorized by the file handler. This is a required attorney function, as she is the only individual authorized to engage in such discussions.	175.00	0.10	17.50
	JKB	L460	A102	Research regarding collection of costs for denial of requests for admissions later proven to be accurate, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal			

Hansen v. Roberts
 Insured: Matthew Roberts
 Claim No.: 72 43 20 0011944
 Date of Loss: 12/12/2008

				Rate	Hours	
JKB	L460	A103	knowledge to perform this task.	175.00	1.20	210.00
			Draft multi-page, detailed, additional section of memorandum in support of costs and fees based upon plaintiff's denial of liability in this matter, in order to obtain reimbursement for costs and attorney fees in this matter, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.			
JKB	L460	A103	Draft Motion for Entry of Judgment and Memorandum in Support, as authorized by the claims representative. This is a required attorney function since she is the only one with the legal knowledge to perform this task.	175.00	1.40	245.00
				175.00	0.80	140.00
			For Current Services Rendered		4.70	814.50

Recapitulation

Attorney	Hours	Rate	Total
Jennifer K. Brizee	4.60	\$175.00	\$805.00
Judy Graf	0.10	95.00	9.50

02/15/2011	L110	E101	Photocopies (49 copies @ \$0.06 per copy)	2.94
			Total Expenses	2.94
			Total Current Work	817.44
01/17/2011			PAYMENT RECEIVED - THANK YOU!	-14,335.44
02/15/2011			PAYMENT RECEIVED - THANK YOU!	-285.00
			Total Payments	-14,620.44
			Balance Due	<u>\$5,812.83</u>

Task Code Recapitulation

L110	Fact Investigation/Developement	0.00	2.94
L100	Case Assessment, Development and Administration	0.00	2.94
L250	Other Written Motions and Submissions	9.50	0.00
L200	Pre-Trial Pleadings and Motions	9.50	0.00

Allied Group Insurance

Page: 4
February 23, 2011
Account No: 8000-327M
Statement No: 18

Hansen v. Roberts
Insured: Matthew Roberts
Claim No.: 72 43 20 0011944
Date of Loss: 12/12/2008

L420	Expert Witnesses	52.50	0.00
L460	Post-Trial Motions and Submissions	<u>752.50</u>	<u>0.00</u>
L400	Trial Preparation and Trial	805.00	0.00

EXHIBIT B

Jordan S. Ipsen (ISB #7822)
GORDON LAW FIRM, INC.
477 Shoup Ave, Suite 101
Idaho Falls, ID 83402
Telephone: (208) 552-0467
Facsimile: (866) 886-3419

RECEIVED
MAR 11 2010

BY:.....

Attorney for Plaintiff

**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNEVILLE**

LARRY HANSEN,

Plaintiff,

vs.

MATTHEW ROBERTS,

Defendant.

Case No. CV-09-3163

**PLAINTIFF'S ANSWERS TO
DEFENDANT'S FIRST SET OF
INTERROGATORIES, RESPONSES TO
REQUESTS FOR PRODUCTION OF
DOCUMENTS, AND RESPONSES TO
REQUESTS FOR ADMISSIONS**

Plaintiff, by and through his undersigned counsel, hereby submits his answers to Defendant's First Set of Interrogatories, Requests for Production of Documents and Requests for Admissions as follows:

GENERAL OBJECTIONS

Plaintiff objects to Defendant's definitions on the grounds they seek to impose obligations and burdens beyond those permitted by the Idaho Rules of Civil Procedure and other

DISCOVERY RESPONSES - 1

excluding communications solely between plaintiff and his attorneys.

PRODUCTION NO. 20: Objection; the request is vague, overly broad, unduly burdensome and seeks information that is protected by the work-product doctrine. Without waiving the objection, see attached documents.

REQUEST FOR PRODUCTION NO. 21: Please produce any and all written reports or documents of any kind whatsoever generated, relied upon, reviewed or possessed by treating or consulting expert witnesses of any type retained to render expert testimony on issues of liability and/or damages in the above-entitled matter.

PRODUCTION NO. 21: See attached documents.

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1: Please admit that your actions were a proximate cause of the occurrence described in your Complaint.

ADMISSION NO. 1: Deny.

REQUEST FOR ADMISSION NO. 2: Please admit that in the absence of your conduct, the occurrence described in your Complaint would not have occurred.

ADMISSION NO. 2: Objection; vague and irrelevant.

REQUEST FOR ADMISSION NO. 3: Please admit that you were in actual physical control of your vehicle, as described in your Complaint, which was involved in the occurrence.

ADMISSION NO. 3: Admit.

REQUEST FOR ADMISSION NO. 4: Admit that defendant did not cause of the subject accident.

ADMISSION NO. 4: Deny.

REQUEST FOR ADMISSION NO. 5: Admit that defendant did not contribute to the cause of the subject accident.

ADMISSION NO. 5: Deny.

REQUEST FOR ADMISSION NO. 6: Admit that your negligence was the direct and proximate cause of the collision.

ADMISSION NO. 6: Deny.

REQUEST FOR ADMISSION NO. 7: Admit the subject accident was investigated by the local law enforcement agency.

ADMISSION NO. 7: Plaintiff admits that a local law enforcement agency responded to the scene of the collision, but Plaintiff is without sufficient knowledge to admit or deny whether the agency conducted an investigation.

REQUEST FOR ADMISSION NO. 8: Admit the investigation law enforcement officer cited you for violation of Idaho Code § 49-637.

ADMISSION NO. 8: Objection; irrelevant.

REQUEST FOR ADMISSION NO. 9: Admit you violated Idaho Code § 49-637.

ADMISSION NO. 9: Deny.

REQUEST FOR ADMISSION NO. 10: Admit your violation of Idaho Code § 49-637 equates to negligence per se.

ADMISSION NO. 10: Deny.

REQUEST FOR ADMISSION NO. 11: Admit the investigating law enforcement officer determined you were at fault for this accident.

ADMISSION NO. 11: Upon reasonable inquiry, Plaintiff does not have sufficient information to either deny or admit this request and, therefore, denies the same.

REQUEST FOR ADMISSION NO. 12: Admit the investigating law enforcement officer did not cite the defendant for any violation of any statute relative to the subject accident.

ADMISSION NO. 12: Objection; irrelevant.

REQUEST FOR ADMISSION NO. 13: Admit the investigating law enforcement officer determined the defendant was not at fault for the subject accident.

ADMISSION NO. 13: Upon reasonable inquiry, Plaintiff does not have sufficient information to either deny or admit this request and, therefore, denies the same.

DATED this ____ day of _____, 200__.

Larry Hansen

SUBSCRIBED AND SWORN before me this ____ day of _____, 200__.

NOTARY PUBLIC

As to objections and admissions:

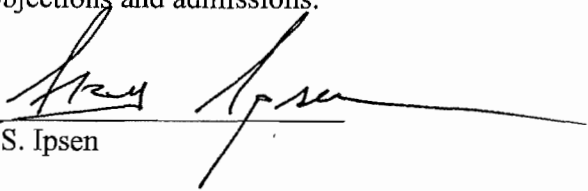

Jordan S. Ipsen

EXHIBIT C

Jordan S. Ipsen (ISB #7822)
GORDON LAW FIRM, INC.
477 Shoup Ave, Suite 101
Idaho Falls, ID 83402
Telephone: (208) 552-0467
Facsimile: (866) 886-3419

Attorney for Plaintiff

**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNEVILLE**

LARRY HANSEN,

Plaintiff,

vs.

MATTHEW ROBERTS,

Defendant.

Case No. CV-09-3163

**PLAINTIFF'S SUPPLEMENTAL
ANSWERS TO DEFENDANT'S FIRST
SET OF INTERROGATORIES,
RESPONSES TO REQUESTS FOR
PRODUCTION OF DOCUMENTS, AND
RESPONSES TO REQUESTS FOR
ADMISSIONS**

Plaintiff, by and through his undersigned counsel, hereby submits his answers to Defendant's First Set of Interrogatories, Requests for Production of Documents and Requests for Admissions as follows:

GENERAL OBJECTIONS

Plaintiff objects to Defendant's definitions on the grounds they seek to impose

DISCOVERY RESPONSES - 1

to the discovery of admissible evidence.

Plaintiff generally objects to these discovery requests to the extent that they request disclosure of confidential or proprietary information and further assert each and every applicable privilege and rule governing confidentiality to the fullest extent provided by law.

Plaintiff generally objects to these discovery requests to the extent they seek information and documents from time periods that are irrelevant to any issue in this lawsuit.

The objections apply to each numbered response as if set forth therein unless otherwise specified.

A republication or statement in whole or in part of any one or more of the foregoing objections is not intended to waive an objection otherwise not stated.

By agreeing to produce documents in response to a particular request, Plaintiff does not thereby intend to represent, nor does he represent, that any such documents in fact exist or have ever existed in his possession, custody, or control. Rather, by agreeing to produce documents in response to a particular request, Plaintiff intends thereby to represent that he will produce non-privileged documents in his present custody, possession, or control, if any, that are responsive to the request.

INTERROGATORIES

INTERROGATORY NO. 7: State the name and address of each person whom the

DISCOVERY RESPONSES - 1

plaintiff expects to call as an expert witness at the trial. For each such person:

- (a) State the subject matter on which the expert is expected to testify;
- (b) A complete statement of all opinions to be expressed and the basis and reasons therefore;
- (c) The facts, data or other information considered by the witness in forming the opinions;
- (d) Any exhibits to be used by the expert witness as a summary of or support for the opinions; and
- (e) Any qualifications of the witness, including a list of all publications authored by the witness within the preceding ten (10) years, the compensation to be paid for the testimony, and a list of any other cases in which the witness has testified as an expert at trial or by deposition within the four (4) preceding years.

SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 7:

Dr. Heidi Jost, Krista Novak, and agents and employees of Teton Orthopaedics are experts in the field of orthopaedic surgery and are expected to testify on the subject matter of the nature and extent of Plaintiff's injuries, the treatment rendered to Plaintiff following the automobile collision, the connection between the collision and the treatment, the amount of the charges incurred by Plaintiff for his treatment, the reasonableness of the charges, the necessity of the treatment, the probable treatment necessary in the future, including a second hand surgery.

DISCOVERY RESPONSES - 1

The opinions to be expressed are that Larry Hansen suffered a right hand injury secondary to a motor vehicle collision that occurred on December 12, 2008. Larry Hansen suffered a right hand sprain and a right wrist sprain secondary to the motor vehicle collision on December 12, 2008. Following the motor vehicle collision, Larry Hansen suffered scapholunate ligament disruption, LT ligament disruption, radial triangular fibrocartilage complex tear, and ECU instability and subluxation. As a result of Mr. Hansen's injuries sustained in the automobile collision, it was necessary for him to undergo a wrist reconstruction surgery, an arthroscopy TFC debridement, ECU reconstruction, and an SL reconstruction on January 13, 2009. It was also necessary to remove k-wires on March 20, 2009. Although Mr. Hansen had preexisting changes, including ossicle changes, to his right wrist, the automobile collision was a substantial factor in bringing about the scapholunate ligament disruption, LT ligament disruption, radial triangular fibrocartilage complex tear, and ECU instability and subluxation, and need for surgery on January 13, 2009, which would not have been necessary but for the automobile collision. Following the surgery, Mr. Hansen was positive for edema on the distal hand and digits, which was causally related to the automobile collision. It was medically necessary for Mr. Hansen to undergo physical therapy to treat the edema. Mr. Hansen developed RSD, ECU synovitis, and ulnar neuritis, all of which, to a reasonable degree of medical probability, were caused by injuries sustained in the motor vehicle collision that occurred on December 12, 2008. Mr. Hansen has a current need for a proximal row carpectomy

DISCOVERY RESPONSES - 1

to treat injuries causally related to the automobile collision, and would more likely than not benefit from corticosteroid injections. As a result of Mr. Hansen's injuries sustained in the motor vehicle collision and the surgery performed on January 13, 2009, Mr. Hansen was only able to work light duty until June of 2009, at which time he should only work in a sedentary job. The visit to the emergency room on the day of the accident, the follow up with Dr. Mills per the instructions at the emergency room, the injections performed by Dr. Blum, the physical therapy at Teton Hand Therapy, and the second opinion obtained from Dr. Hutchinson were necessary, reasonable and for treatment casually related to injuries sustained in the automobile collision of December 12, 2008.

The opinions are based upon a review of Plaintiff's medical records, observation of Plaintiff, examination of Plaintiff as detailed in the medical records, history taken from Plaintiff, review of diagnostic films and diagnostic reports, results and responses to medical procedures and tests, education, training and experience in the medical profession.

Dr. Douglas Hutchinson and agents and employees of the University of Utah Hospital are experts in the field of orthopaedic surgery and are expected to testify on the subject matter of the nature and extent of Plaintiff's injuries, the treatment rendered to Plaintiff following the automobile collision, the connection between the collision and the treatment, the amount of the charges incurred by Plaintiff for his treatment, the reasonableness of the charges, the necessity of the treatment, the probable treatment necessary in the future, including a second hand surgery.

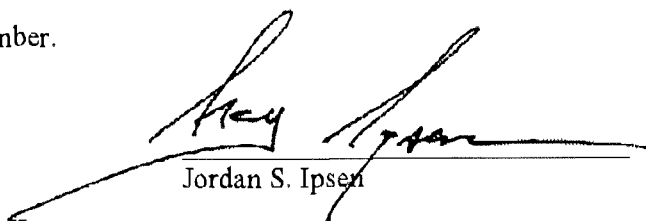
DISCOVERY RESPONSES - 1

The opinions to be expressed are that Larry Hansen suffered an acute injury to his right hand and wrist on December 12, 2008 resulting in a contusion on his right hand, and possible dislocation of C-MC joint or right 3-4 joint, subluxation of the proximal fourth metacarpal bone and that further orthopedic follow up was necessary. The opinions are based upon a review of Plaintiff's medical records, observation of Plaintiff, examination of Plaintiff as detailed in the medical records, history taken from Plaintiff, review of diagnostic films and diagnostic reports, results and responses to medical procedures and tests, education, training and experience in the medical profession.

David Kessel, Tregg Scott, and agents and employees of Idavada Claims, Inc. are experts in the field of scene investigation and scene diagramming. The opinions to be expressed are that the measurements and scene diagram in their report truly and accurately depicts the scene of the automobile collision which forms the basis of this litigation.

Plaintiff incorporates by reference all opinions, conclusions, and facts stated in his medical records that have been previously produced in discovery of this litigation.

DATED this 20 day of September.



Jordan S. Ipsen

DISCOVERY RESPONSES - 1

EXHIBIT D

DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNEVILLE

LARRY HANSEN,)
)
 Plaintiff,)
 vs.) Case No.
)
 MATTHEW ROBERTS,) CV-09-3163
)
 Defendant.)
 _____)

ORAL DEPOSITION OF HEIDI MICHELSEN-JOST, M.D.

Taken on October 11, 2010

REPORTED BY:

PAUL D. BUCHANAN, RPR, RMR,
 CSR No. 7, and Notary Public

257

1 A. Yes.
 2 Q. He has filed a lawsuit against my client,
 3 Matthew Roberts, claiming he injured his right wrist
 4 in an automobile accident of December 12, 2008. Are
 5 you aware of this litigation?

6 A. No.
 7 Q. You did not have any knowledge that this
 8 lawsuit was going on until you received my depo
 9 notice; is that accurate?

10 A. To be honest, I really didn't know what the
 11 deposition was about except that it had to do with a
 12 car accident. I didn't know if he was suing anyone or
 13 whether it was the insurance company or --

14 Q. He sued my client, Matthew Roberts, who was
 15 the driver of the other vehicle involved in the car
 16 accident.

17 A. Okay.
 18 Q. Were you aware that you had been listed as a
 19 witness by Mr. Hansen in this litigation?

20 A. I don't know. I may have but didn't
 21 remember.

22 Q. Are you planning to come to Idaho Falls next
 23 week to testify at trial?

24 A. No.
 25 Q. I am going to hand you what's been marked as

1 A. Yes.
 2 Q. I am going to hand you what's been marked as
 3 Deposition Exhibit B, which is a copy of your chart.
 4 This is not a closed book process. You are welcome to
 5 look at my Exhibit B or at your chart. I think we can
 6 cross reference if we need to and hopefully track with
 7 each other. And you will see my Exhibit B is also
 8 marked Trial Exhibit J 1 through 65 for the record.

9 Can you tell me, I have in the charts that I
 10 have from your office, I have Mr. Hansen's last visit
 11 with your office being 5/17/2010. Is that consistent
 12 with what you have in your chart?

13 A. Yes.
 14 Q. And I also have his first visit with your
 15 office being on 12/22/08. Is that consistent with
 16 your office chart?

17 A. Yes.
 18 Q. Do you have an understanding of how Mr.
 19 Hansen came to be a patient of yours?

20 A. Are you asking who referred him to my
 21 office?

22 Q. Well, if anybody, I don't know.
 23 A. I don't know either.

24 Q. Do you have any information in your file
 25 that indicates another physician referred him to your

1 Deposition Exhibit A. This is your notice of
 2 deposition, and my presumption is you have seen this
 3 notice before today; is that correct?

4 A. Yes.
 5 Q. And in this deposition notice we asked for
 6 you to bring with you your records regarding Larry
 7 Hansen. Have you done so?

8 A. I have his chart (indicating).
 9 Q. So we are going to go ahead and mark that as

10 Deposition Exhibit I, and once we are done, we will
 11 work out what we are going to do with that. I think
 12 we probably have most of your chart already, but --

13 A. You probably should, I would imagine.

14 Q. The only thing I know for sure I was missing
 15 is we have Dr. Hutchinson's chart and he has some
 16 letters going back and forth and we didn't get
 17 correspondence. But let's go off the record and mark
 18 it and we will take a look at that later on.

19 (Discussion off the record.)
 20 MS. BRIZEE: Back on the record.

21 Q. We are going to say that we are going to
 22 mark this as Deposition Exhibit I, at least the parts
 23 and pieces that we may want to copy, but we will work
 24 on that after this is completed, if that's okay with
 25 you.

1 office?
 2 A. No.

3 Q. During the time that you cared for and
 4 treated Mr. Hansen, did he ever describe for you what
 5 happened to his hand or his wrist in the automobile
 6 accident of December 12, 2008?

7 A. The mechanics of the injury are not
 8 specifically discussed, just that it occurred during
 9 the accident when a car hit him when he was turning.

10 Q. So he has not described to you what happened
 11 to his body or what happened to his hand or wrist
 12 during the accident.

13 A. No.

14 Q. Do you have an understanding from any other
 15 sources as to what happened to Mr. Hansen's hand or
 16 wrist during this accident?

17 A. I do have an emergency room record from the
 18 time of injury and it notes that he sustained a direct
 19 blow to his hand.

20 Q. What does that mean in your world, in the
 21 medical world, when you see the words direct blow,
 22 what does that mean to you?

23 A. It could be that something struck him, his
 24 arm hit the steering wheel, it hit the door, it hit
 25 something, hit another person in the car, it could