

Uldaho Law

## Digital Commons @ Uldaho Law

---

Idaho Supreme Court Records & Briefs, All

Idaho Supreme Court Records & Briefs

---

10-19-2017

### Valiant Idaho, LLC v. North Idaho Resorts, LLC Clerk's Record v. 46 Dckt. 44583

Follow this and additional works at: [https://digitalcommons.law.uidaho.edu/idaho\\_supreme\\_court\\_record\\_briefs](https://digitalcommons.law.uidaho.edu/idaho_supreme_court_record_briefs)

---

#### Recommended Citation

"Valiant Idaho, LLC v. North Idaho Resorts, LLC Clerk's Record v. 46 Dckt. 44583" (2017). *Idaho Supreme Court Records & Briefs, All*. 7023.

[https://digitalcommons.law.uidaho.edu/idaho\\_supreme\\_court\\_record\\_briefs/7023](https://digitalcommons.law.uidaho.edu/idaho_supreme_court_record_briefs/7023)

This Court Document is brought to you for free and open access by the Idaho Supreme Court Records & Briefs at Digital Commons @ Uldaho Law. It has been accepted for inclusion in Idaho Supreme Court Records & Briefs, All by an authorized administrator of Digital Commons @ Uldaho Law. For more information, please contact [annablaine@uidaho.edu](mailto:annablaine@uidaho.edu).

Vol. **46** of **85**  
IN THE

**SUPREME COURT  
OF THE  
STATE OF IDAHO**

ISC #44583, 44584, 44585  
Bonner #CV2009-1810

**Valiant Idaho, LLC**  
*Cross-Claimant/Respondent*

vs.

**North Idaho Resorts  
JV, LLC  
VP Incorporated**  
*Cross-Defendants/Appellants*

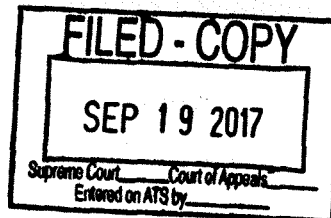
**CLERK'S RECORD ON APPEAL**

*Appealed from the District Court of the First Judicial District  
of the State of Idaho, in and for the County of Bonner*

Richard L. Stacey  
Jeff R. Sykes  
Chad M. Nicholson  
827 East Park Boulevard, Suite 201  
Boise, Idaho 83712  
*Attorneys for Respondents*

Gary A. Finney  
120 East Lake Street, Suite 317  
Sandpoint, Idaho 83864  
*Attorney for Appellant JV*

Daniel M. Keyes  
Susan P. Weeks  
1626 Lincoln Way  
Coeur d'Alene, Idaho 83814  
*Attorneys for Appellants VP and North Idaho Resorts*



**VOLUME XLVI**

**44583**

**TABLE OF CONTENTS**

Title Page ..... Vol. I - 1

Clerk’s Record on Appeal..... Vol. I - 2

Table of Contents..... Vol. I - 3

Index .....Vol. I - 34

ROA Report for Case CV2009-1810 – printed May 10, 2017.....Vol. I - 65

Supreme Court Order re: 44583 - Consolidating Appeal nos. 44583, 44584 and 44585 – filed 11/04/2016 ....Vol. I - 166

Supreme Court Order re: 44584 - Consolidating Appeal nos. 44583, 44584 and 44585 – filed 11/04/2016 ....Vol. I - 168

Supreme Court Order re: 44585 - Consolidating Appeal nos. 44583, 44584 and 44585 – filed 11/04/2016 ....Vol. I - 170

Complaint – filed 10/13/2009..... Vol. I - 172

Acknowledgment of Service of Summons and Complaint (VP Inc.) – filed 04/07/2010 ..... Vol. I - 197

Acknowledgment of Service of Summons and Complaint (North Idaho Resorts, LLC) – filed 04/07/2010 Vol. II - 199

Special Appearance on Behalf of Defendant Pensco Trust Co., Custodian FBO Barney Ng – filed 05/24/2010 Vol. II - 201

Answer, Counterclaims, Cross-claims and Third Party Complaint of Defendant ACI Northwest, Inc. – filed 08/09/2010Vol. II - 204

Special Appearance on Behalf of Defendant Mortgage Fund '08, LLC – filed 10/05/2010 ..... Vol. II - 228

Notice of Appearance – filed 10/14/2010 ..... Vol. II - 233

Reply by R.E. Loans, LLC to Cross-claim by ACI Northwest, Inc. – filed 02/04/2011..... Vol. II - 237

Affidavit of Service – filed 03/11/2011 ..... Vol. II - 244

R.E. Loans, LLC’s Answer to Complaint – filed 04/21/2011..... Vol. II - 245

Order Granting Leave for Withdrawal of Attorney – filed 05/18/2011..... Vol. II - 260

Substitution of Counsel – filed 08/29/2011 ..... Vol. II - 264

Administrative Order – filed 09/27/2011 ..... Vol. II - 267

Stay Order (R.E. Loans, LLC) – filed 09/29/2011..... Vol. II - 275

Stay Order (Mortgage Fund '08, LLC) – filed 09/29/2011..... Vol. II - 284

Notice of Appearance – filed 09/29/2011 ..... Vol. II - 290

Assignment of District Court Cases – filed 11/15/2011 ..... Vol. II - 295

Wells Fargo’s Motion to Dismiss with Prejudice – filed 01/23/2012..... Vol. II - 298

Affidavit of Stanley J. Tharp in Support of Defendant Wells Fargo's Motion to Dismiss with Prejudice – filed 01/23/2012	Vol. II - 302
Order Granting Defendant Wells Fargo's Motion to Dismiss with Prejudice – filed 03/16/2012	Vol. II - 312
R.E. Loans, LLC's Request to Lift the Automatic Stay – filed 06/28/2012	Vol. II - 317
Order Granting R.E. Loans, LLC's Request to Lift Automatic Stay – filed 08/24/2012	Vol. II - 325
Order Dismissing all Claims with Prejudice against Interstate Concrete and Asphalt Company – filed 09/13/2012	Vol. II - 330
R.E. Loans, LLC's Motion to Lift Automatic Stay (Mortgage Fund '08 LLC) – filed 06/26/2013	Vol. II - 336
Memorandum in Support of R.E. Loans, LLC's Motion to Lift Automatic Stay (Mortgage Fund '08 LLC) – filed 06/26/2013	Vol. III - 339
Affidavit of Richard L. Stacey in Support of R.E. Loans, LLC's Motion to Lift Automatic Stay – filed 06/26/2013	Vol. III - 343
R.E. Loans, LLC's Motion for Entry of Default (Genesis Golf Builders) – filed 08/12/2013	Vol. III - 362
Affidavit of Richard L. Stacey in Support of R.E. Loans, LLC's Motion for Entry of Default (Genesis Golf Builders) – filed 08/12/2013	Vol. III - 365
Order Granting R.E. Loans, LLC's Motion to Lift Automatic Stay (Mortgage Fund '08 LLC) – filed 08/12/2013	Vol. III - 374
R.C. Worst & Company, Inc.'s Motion for Entry of Default (Genesis Golf Builders) – filed 08/14/2013	Vol. III - 378
Default Judgment (Genesis Golf Builders) – filed 08/15/2013	Vol. III - 383
Order for Entry of Default (Genesis Golf Builders) – filed 08/15/2013	Vol. III - 386
Clerk's Entry of Default (Genesis Golf Builders) – filed 08/15/2013	Vol. III - 389
Order for Entry of Default (Genesis Golf Builders, Inc.) – filed 08/29/2013	Vol. III - 392
Clerk's Entry of Default (Genesis Golf Builders, Inc.) – filed 08/29/2013	Vol. III - 397
Default Judgment (Genesis Golf Builders) – filed 08/29/2013	Vol. III - 402
North Idaho Resorts, LLC's Motion for Entry of Default (Genesis Golf Builders) – filed 10/25/2013	Vol. III - 407
Affidavit of Susan P. Weeks in Support of North Idaho Resorts, LLC's Motion for Entry of Default (Genesis Golf Builders) – filed 10/25/2013	Vol. III - 412
Order for Entry of Default (Genesis Golf Builders) – filed 11/01/2013	Vol. III - 423
Default Judgment (Genesis Golf Builders) – filed 11/01/2013	Vol. III - 428
Clerk's Entry of Default (Genesis Golf Builders) – filed 11/01/2013	Vol. III - 433
R.E. Loans, LLC's Motion for Summary Judgment Against Cross-Claimant ACI Northwest, Inc. – filed 04/29/2014	Vol. III - 438
R.E. Loans, LLC's Memorandum in Support of its Motion for Summary Judgment Against Cross-claimant ACI Northwest, Inc. – filed 04/29/2014	Vol. III - 441

Declaration of Chad M. Nicholson in Support of R.E. Loans, LLC's Motion for Summary Judgment Against Cross-claimant ACI Northwest, Inc. – filed 04/29/2014 .....	Vol. IV - 451
R.E. Loans, LLC's Motion for Summary Judgment Against Cross-Claimant R.C. Worst & Company, Inc. – filed 04/29/2014 .....	Vol. IV - 488
R.E. Loans, LLC's Memorandum in Support of its Motion for Summary Judgment Against Cross-claimant R.C. Worst & Company, Inc. – filed 04/29/2014 .....	Vol. IV - 491
Declaration of Richard L. Stacey in Support of R.E. Loans, LLC's Motion for Summary Judgment Against Cross-claimant R.C. Worst & Company, Inc. – filed 04/29/2014 .....	Vol. IV - 498
Affidavit of Farley Dakan in Support of R.E. Loans, LLC's Motions for Summary Judgment – filed 04/29/2014	Vol. IV - 532
Affidavit of Charles Reeves in Support of R.E. Loans, LLC's Motions for Summary Judgment – filed 04/29/2014	Vol. V - 551
Order Dismissing R.C. Worst & Company, and All Claims, Counterclaims, and Cross Claims thereof Pursuant to Oral Offer of Resolution Advanced to the Court on May 28, 2014 – filed 06/02/2014 .....	Vol. V - 636
Notice of Change of Firm Affiliation – filed 07/18/2014 .....	Vol. V - 643
Findings re: R.E. Loans, LLC's Motions for Summary Judgment Against ACI Northwest, Inc. – filed 07/21/2014	Vol. V - 647
Judgment – filed 07/21/2014 .....	Vol. V - 653
Motion to Substitute Valiant Idaho, LLC in Place of R.E. Loans, LLC as the Real Party in Interest – filed 07/21/2014	Vol. V - 656
Declaration of Richard L. Stacey in Support of Motion to Substitute Valiant, Idaho LLC in Place of R.E. Loans, LLC as the Real Party in Interest – filed 07/21/2014 .....	Vol. V - 674
Order Substituting Valiant Idaho, LLC in Place of R.E. Loans, LLC as the Real Party in Interest – filed 08/07/2014	Vol. V - 667
Motion to Substitute Valiant Idaho, LLC in Place of Wells Fargo Capital Finance, LLC as the Real Party in Interest – filed 08/18/2014 .....	Vol. V - 670
Declaration of Richard L. Stacey in Support of Motion to Substitute Valiant Idaho, LLC in Place of Wells Fargo Capital Finance, LLC as the Real Party in Interest – filed 08/18/2014 .....	Vol. VI - 674
Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure – filed 08/19/2014	Vol. VI - 739
Summons on Third Party Complaint brought by Third Party Plaintiff Valiant Idaho, LLC [Pend Oreille Bonner Development Holdings, Inc.] – filed 09/03/2014 .....	Vol. VI - 768
Defendant North Idaho Resorts, LLC's Motion to Substitute Valiant Idaho, LLC in Place of Wells Fargo Capital Finance, LLC as the Real Party in Interest – filed 09/04/2014 .....	Vol. VI - 771
Valiant Idaho, LLC's Notice of Intent to Take Default – filed 09/10/2014 .....	Vol. VI - 776
Order Substituting Valiant Idaho, LLC in Place of Wells Fargo Capital Finance, LLC as the Real Party in Interest – filed 09/12/2014 .....	Vol. VI - 781

JV, LLC's Special Appearance Contesting Jurisdiction; and JV, LLC's Answer to Complaint; and JV, LLC's Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure; and JV, LLC's Cross-claim; and JV, LLC's Third Party Complaint – filed 09/15/2014 .....	Vol. VII - 784
Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure – filed 09/15/2014 .....	Vol. VII - 844
North Idaho Resorts, LLC's Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure – filed 09/19/2014 .....	Vol. VII - 860
Valiant Idaho, LLC's Notice of Intent to Take Default – filed 09/25/2014 .....	Vol. VII - 874
Valiant Idaho, LLC's Motion for Entry of Default Against Cross-defendant T-O Engineers, Inc. – filed 09/26/2014	Vol. VII - 879
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Cross-defendant T-O Engineers, Inc. – filed 09/26/2014 .....	Vol. VII - 884
Order for Entry of Default Against Cross-defendant T-O Engineers, Inc. – filed 09/26/2014 .....	Vol. VII - 896
Clerk's Entry of Default Against Cross-defendant T-O Engineers, Inc. – filed 09/26/2014 .....	Vol. VII - 900
ACI Northwest, Inc.'s Responsive Pleading to Valiant Idaho, LLC's Counterclaim, Cross-Claim, and Third-Party Complaint for Judicial Foreclosure – filed 09/29/2014 .....	Vol. VII - 904
Acceptance of Service by VP, Incorporated of Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure – filed 10/03/2014 .....	Vol. VII - 908
Valiant Idaho, LLC's Notice of Intent to Take Default – filed 10/03/2014 .....	Vol. VII - 911
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Pend Oreille Bonner Development Holdings, Inc. – filed 10/03/2014 .....	Vol. VII - 913
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Pend Oreille Bonner Development Holdings, Inc. – filed 10/03/2014 .....	Vol. VIII - 918
Motion to Substitute Valiant Idaho, LLC in Place of Mortgage Fund '08 LLC as the Real Party in Interest – filed 10/06/2014 .....	Vol. VIII - 928
Declaration of Richard L. Stacey in Support of Motion to Substitute Valiant Idaho, LLC in Place of Mortgage Fund '08 LLC as the Real Party in Interest – filed 10/06/2014 .....	Vol. VIII - 933
Motion to Substitute Valiant Idaho, LLC in Place of Pensco Trust Co, as the Real Party in Interest – filed 10/06/2014	Vol. VIII - 941
Declaration of Richard L. Stacey in Support of Motion to Substitute Valiant Idaho, LLC in Place of Pensco Trust Co. as the Real Party in Interest – filed 10/06/2014 .....	Vol. VIII - 946
Order Regarding Disqualification of Judge – filed 10/06/2014 .....	Vol. VIII - 953
VP, Incorporated's Motion to Dismiss Third Party Complaint – filed 10/06/2014 .....	Vol. VIII - 959
Order of Reassignment – filed 10/09/2014 .....	Vol. VIII - 963
Affidavit of Service – filed 10/20/2014 .....	Vol. VIII - 965

Order for Entry of Default Against Third Party Defendant Pend Oreille Bonner Development Holdings, Inc. – filed 10/21/2014 .....	Vol. VIII - 969
Clerk’s Entry of Default Against Third Party Defendant Pend Oreille Bonner Development Holdings, Inc. – filed 10/22/2014 .....	Vol. VIII - 973
Motion for Leave to Amend Answer to Allege a Counterclaim and Cross-claim, and to Serve Third Party Complaint – filed 11/05/2014 .....	Vol. VIII - 977
Memorandum in Opposition to VP, Incorporated’s Motion to Dismiss Third Party Complaint or, in the Alternative, Motion for Leave to Amend Answer to Allege a Counterclaim and Cross-claim, and to Serve Third Party Complaint – filed 11/05/2014 .....	Vol. VIII - 982
Third Party Defendant Idaho Club Homeowner’s Association, Inc.’s Motion and Memorandum to Dismiss Claim Asserted by Third Party Plaintiff JV, LLC – filed 11/07/2014.....	Vol. VIII - 996
Third Party Defendant Panhandle Management, Incorporated’s Motion and Memorandum to Dismiss Claims Asserted by Third Party Plaintiff JV, LLC – filed 11/07/2014.....	Vol. VIII - 1006
Affidavit of Toby McLaughlin in Support of Third Party Defendant Panhandle Management Incorporated’s Motion to Dismiss Claim Asserted by Third Party Plaintiff JV, LLC – filed 11/07/2014 .....	Vol. IX - 1015
Affidavit of Toby McLaughlin in Support of Third Party Defendant Idaho Club Homeowner’s Association Inc.’s Motion to Dismiss Claim Asserted by Third Party Plaintiff JV, LLC – filed 11/07/2014 .....	Vol. IX - 1100
Defendant VP, Incorporated’s Request for Extension of Time to Respond to Valiant Idaho, LLC’s Motion for Leave to Amend Answer to Allege a Counterclaim and Cross-claim, and to Serve Third Party – filed 11/12/2014....	Vol. X - 1153
VP, Incorporated’s Reply on Motion to Dismiss Third Party Complaint and Response to Motion to Amend Pleadings – filed 11/14/2014.....	Vol. X - 1156
Order Granting Valiant Idaho, LLC Leave to Serve its Third Party Complaint – filed 11/19/2014 .....	Vol. X - 1160
Order Granting Valiant Idaho, LLC Leave to Amend Answer to Allege a Counterclaim and Cross-Claim – filed 11/19/2014 .....	Vol. X - 1164
Order Substituting Valiant Idaho, LLC in Place of Pensco Trust Co. as the Real Party in Interest – filed 11/19/2014	Vol. X - 1168
Order Substituting Valiant Idaho, LLC in Place of Mortgage Fund ’08 LLC as the Real Party in Interest – filed 11/19/2014 .....	Vol. X - 1171
Order Denying VP, Incorporated’s Motion to Dismiss Third Party Complaint – filed 11/19/2014 .....	Vol. X - 1174
Stipulation to Entry of Judgment Against Pend Oreille Bonner Development, LLC – filed 11/19/2014 .....	Vol. X - 1178
Stipulation to Entry of Judgment Against Charles W. Reeves and Anna B. Reeves – filed 11/19/2014.....	Vol. X - 1200
Stipulation to Entry of Judgment Against Pend Oreille Bonner Development Holdings, Inc. – filed 11/19/2014	Vol. X - 1221
Complaint for Judicial Foreclosure – filed 11/19/2014 .....	Vol. X - 1242
Order Settling Trial and Pretrial Order – filed 11/20/2014 .....	Vol. X - 1270
Order on Stipulation to Entry of Judgment Against Pend Oreille Bonner Development Holdings, Inc. – filed 11/20/2014	Vol. XI - 1276

Order on Stipulation to Entry of Judgment Against Pend Oreille Bonner Development, LLC – filed 11/20/2014 Vol. XI - 1296

Order on Stipulation to Entry of Judgment Against Charles W. Reeves and Ann B. Reeves – filed 11/20/2014 ... Vol. XI - 1317

Valiant Idaho, LLC’s Motion for Leave to Amend Third Party Complaint to Join an Additional Party – filed 11/24/2014 ..... Vol. XI - 1337

Memorandum in Support of Valiant Idaho, LLC’s Motion for Leave to Amend Third Party Complaint to Join an Additional Party – filed 11/24/2014 ..... Vol. XI - 1371

Cross-defendant, VP, Incorporated’s Request for Extension of Time to Answer or Otherwise Plead to Valiant, LLC’s Amended Answer to Allege a Counter-Claim and Cross-Claim and to Serve Third Party – filed 12/01/2014 Vol. XI - 1377

Order Granting Cross-defendant, VP, Incorporated’s Request for Extension of Time to Answer or Otherwise Plead to Valiant, LLC’s Amended Answer to Allege a Counter-Claim and Cross-Claim and to Serve Third Party – filed 12/03/2014 Vol. XI - 1379

Valiant Idaho, LLC’s Motion for Entry of Default Against Counter-Defendant Genesis Golf Builders, Inc. – filed 12/08/2014 ..... Vol. XI - 1382

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC’s Motion for Entry of Default Against Counter-Defendant Genesis Golf Builders, Inc. – filed 12/08/2014 ..... Vol. XI - 1387

Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Amy Korengut – filed 12/08/2014 Vol. XI - 1394

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Amy Korengut – filed 12/08/2014 ..... Vol. XI - 1399

Affidavit of Non-Military Service in Support of Motion for Entry of Default of Amy Korengut – filed 12/08/2014 Vol. XI - 1409

Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Independent Mortgage Ltd. Co. – filed 12/08/2014 ..... Vol. XII - 1414

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Independent Mortgage Ltd. Co. – filed 12/08/2014 ..... Vol. XII - 1419

Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant C.E. Kramer Crane & Contracting, Inc. – filed 12/08/2014 ..... Vol. XII - 1429

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant C.E. Kramer Crane & Contracting, Inc. – filed 12/08/2014 ..... Vol. XII - 1434

Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Netta Source, LLC – filed 12/08/2014 Vol. XII - 1444

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Netta Source, LLC – filed 12/08/2014 ..... Vol. XII - 1449

Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Montaheno Investments, LLC – filed 12/08/2014 ..... Vol. XII - 1459

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Montaheno Investments, LLC – filed 12/08/2014 ..... Vol. XII - 1464



Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Russ Capital Group, LLC – filed 12/08/2014 .....	Vol. XII - 1474
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Russ Capital Group, LLC – filed 12/08/2014 .....	Vol. XII - 1479
Valiant Idaho, LLC's Notice of Intent to Take Default – filed 12/08/2014 .....	Vol. XII - 1489
Order for Entry of Default Against Amy Korengut – filed 12/10/2014.....	Vol. XII - 1495
Clerk's Entry of Default Against Amy Korengut – filed 12/10/2014.....	Vol. XII - 1498
Order for Entry of Default Against Montaheno Investments, LLC – filed 12/10/2014 .....	Vol. XII - 1501
Clerk's Entry of Default Against Montaheno Investments, LLC – filed 12/10/2014 .....	Vol. XII - 1504
Order for Entry of Default Against Genesis Golf Builders, Inc. – filed 12/10/2014 .....	Vol. XII - 1507
Clerk's Entry of Default Against Genesis Golf Builders, Inc. – filed 12/10/2014 .....	Vol. XII - 1511
Order for Entry of Default Against C.E. Kramer Crane & Contracting, Inc. – filed 12/10/2014 .....	Vol. XII - 1515
Clerk's Entry of Default Against C.E. Kramer Crane & Contracting, Inc. – filed 12/10/2014 .....	Vol. XII - 1518
Order of Entry of Default Against Russ Capital Group, LLC – filed 12/10/2014 .....	Vol. XII - 1521
Clerk's Entry of Default Against Russ Capital Group, LLC – filed 12/10/2014.....	Vol. XII - 1524
Order for Entry of Default Against Netta Source, LLC – filed 12/10/2014 .....	Vol. XII - 1527
Clerk's Entry of Default Against Netta Source, LLC – filed 12/10/2014 .....	Vol. XII - 1530
VP, Incorporated's Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third-party Complaint for Judicial Foreclosure – filed 12/11/2014 .....	Vol. XII - 1533
Valiant Idaho, LLC's Reply to: (1) JV LLC's Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third-party Complaint for Judicial Foreclosure; and (2) JV LLC's Cross-claim and Third Party Complaint – filed 12/15/2014	Vol. XII - 1541
Stipulation to Entry of Judgment Against First American Title Company of Idaho – filed 12/17/2014 .....	Vol. XIII - 1555
Order on Stipulation to Entry of Judgment Against First American Title Company of Idaho – filed 12/17/2014	Vol. XIII - 1576
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Timberline Investments, LLC – filed 12/22/2014.....	Vol. XIII - 1596
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Timberline Investments, LLC – filed 12/22/2014.....	Vol. XIII - 1601
Stipulation to Entry of Judgment Against Dan S. Jacobson; Sage Holdings, LLC; and Steven G. Lazar – filed 01/02/2015	Vol. XIII - 1611
Order for Entry of Default Against Independent Mortgage Ltd. Co. – filed 01/06/2015 .....	Vol. XIII - 1633
Clerk's Entry of Default Against Independent Mortgage Ltd. Co. – filed 01/06/2015 .....	Vol. XIII - 1636

Order for Entry of Default Against Timberline Investments, LLC – filed 01/06/2015 .....	Vol. XIII - 1639
Clerk’s Entry of Default Against Timberline Investments, LLC – filed 01/06/2015 .....	Vol. XIII - 1642
Order on Stipulation to Entry of Judgment Against Dan S. Jacobson, Sage Holdings LLC and Steven G. Lazar – filed 01/06/2015 .....	Vol. XIII - 1645
Stipulation for Settlement and Dismissal of JV, LLC’s Third Party Complaint Against Idaho Club Homeowner’s Association, Inc. – filed 01/09/2015.....	Vol. XIII - 1666
Stipulation to Entry of Judgment Against Idaho Club Homeowner’s Association, Inc. – filed 01/12/2015.....	Vol. XIII - 1673
Judgment (Dismissal of JV, LLC’s Third Party Complaint Against Idaho Club Homeowner’s Association, Inc.) – filed 01/15/2015 .....	Vol. XIV - 1694
Order on Stipulation to Entry of Judgment Against Idaho Club Homeowner’s Association, Inc. – filed 01/15/2015 .....	Vol. XIV - 1700
Valiant Idaho, LLC’s Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 01/20/2015.....	Vol. XIV - 1720
Memorandum in Support of Valiant Idaho, LLC’s Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 01/20/2015 .....	Vol. XIV - 1725
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC’s Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 01/20/2015 .....	Vol. XV - 1747
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC’s Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated (Continued) – filed 01/20/2015 .....	Vol. XVI - 1884
Affidavit of Charles W. Reeves – filed 01/20/2015 .....	Vol. XVII - 1912
Affidavit of Charles W. Reeves (Continued) – filed 01/20/2015 .....	Vol. XVIII - 2039
Notice of Hearing on Valiant Idaho, LLC’s Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 01/20/2015 .....	Vol. XVIII - 2070
JV, LLC’s Memorandum in Opposition to Valiant Idaho, LLC’s Motion for Summary Judgment – filed 02/02/2015 .....	Vol. XIX - 2076
JV, LLC’s Memorandum in Opposition to Valiant Idaho, LLC’s Motion for Summary Judgment (Continued) – filed 02/02/2015 .....	Vol. XX - 2210
JV’s Affidavit of James W. Berry Opposing Valiant’s Motion for Summary Judgment – filed 02/02/2015.....	Vol. XX - 2323
JV, LLC’s Motion to Vacate Valiant’s Hearing Date of February 18, 2015 on its Motion for Summary Judgment, Request for Continuance and Request for Hearing on Short Notice – filed 02/02/2015.....	Vol. XX - 2331
Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Bar K, Inc. – filed 02/02/2015.....	Vol. XX - 2337
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC’s Motion for Entry of Default Against Third Party Defendant Bar K, Inc. – filed 02/02/2015 .....	Vol. XXI - 2342
Order for Entry of Default Against Bar K, Inc. – filed 02/03/2015 .....	Vol. XXI - 2353
Clerk’s Entry of Default Against Bar K, Inc. – filed 02/03/2015 .....	Vol. XXI - 2356

Defendants North Idaho Resorts, LLC and VP Incorporated's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment – filed 02/04/2015 .....	Vol. XXI - 2359
Request for Judicial Notice – filed 02/04/2015 .....	Vol. XXI - 2372
Declaration of Richard Villelli in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC and VP, Incorporated – filed 02/04/2015 .....	Vol. XXI - 2392
Stipulation to Entry of Judgment Against Mountain West Bank – filed 02/04/2015 .....	Vol. XXI - 2452
Order on Stipulation to Entry of Judgment Against Mountain West Bank – filed 02/06/2015 .....	Vol. XXII - 2473
Amended Notice of Hearing on Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC and VP, Incorporated – filed 02/13/2015 .....	Vol. XXII - 2493
Judgment (Pucci Construction, Inc.) – filed 02/18/2015 .....	Vol. XXII - 2499
Judgment (ACI Northwest, Inc.) – filed 02/18/2015 .....	Vol. XXII - 2502
JV, LLC's First Supplemental Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment – filed 02/27/2015 .....	Vol. XXII - 2505
Defendants North Idaho Resorts, LLC and VP, Incorporated's Motion for Enlargement of Time to File Answers and Responses to Discovery Requests Propounded by Valiant Idaho, LLC – filed 03/02/2015 .....	Vol. XXII - 2516
Memorandum in Reply to JV, LLC's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment – filed 03/11/2015 .....	Vol. XXII - 2519
Supplemental Declaration of Jeff R. Sykes in Support of Memorandum in Reply to JV, LLC's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment – filed 03/11/2015 .....	Vol. XXII - 2528
Memorandum in Reply to North Idaho Resorts, LLC and VP, Incorporated's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment – filed 03/11/2015 .....	Vol. XXII - 2547
Order Granting Defendants North Idaho Resorts, LLC and VP, Incorporated's Motion for Enlargement of Time to File Answers and Responses to Discovery Requests Propounded by Valiant Idaho, LLC – filed 03/12/2015 .....	Vol. XXII - 2557
Memorandum Decision & Order Granting Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 04/14/2015 .....	Vol. XXII - 2560
JV, LLC's Motion to Alter, Amend and to Reconsider the Court's Memorandum Decision and Order Filed 04/14/2015 and Request for Oral Argument Time/Date for a Hearing; Not Yet to be Set – filed 04/28/2015 .....	Vol. XXII - 2579
Motion for Reconsideration and Clarification – filed 04/29/2015 .....	Vol. XXII - 2596
Defendants North Idaho Resorts, LLC and VP, Incorporated's Motion for Enlargement of Time to File Memorandum in Support of Motion for Reconsideration and Clarification – filed 05/11/2015 .....	Vol. XXII - 2598
Valiant Idaho, LLC's Motion for Entry of Final Judgment – filed 05/20/2015 .....	Vol. XXII - 2600
Memorandum in Support of Valiant Idaho, LLC's Motion for Entry of Final Judgment – filed 05/20/2015 ...	Vol. XXII - 2605
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Entry of Final Judgment – filed 05/20/2015	Vol. XXIII - 2612

Declaration of C. Dean Shafer in Support of Valiant Idaho, LLC's Motion for Entry of Final Judgment – filed 05/20/2015  
Vol. XXIII - 2627

Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendants Frederick J. Grant and Christine Grant –  
filed 05/22/2015..... Vol. XXIV - 2749

Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendants  
Frederick J. Grant and Christine Grant – filed 05/22/2015.....Vol. I - 2751

Declaration of Pamela Lemieux in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party  
Defendants Frederick J. Grant and Christine Grant – filed 05/22/2015..... Vol. XXIV - 2763

Defendants North Idaho Resorts, LLC and VP Incorporated's Second Motion for Enlargement of Time to File Memorandum  
in Support of Motion for Reconsideration and Clarification – filed 05/26/2015 ..... Vol. XXIV - 2771

Order for Entry of Default Against Third Party Defendants Frederick J. Grant and Christine Grant – filed 05/29/2015 Vol.  
XXIV - 2773

Clerk's Entry of Default Against Third Party Defendants Frederick J. Grant and Christine Grant – filed 05/29/2015 Vol.  
XXIV - 2777

Renewed Motion for Reconsideration and Clarification – filed 06/16/2015 ..... Vol. XXIV - 2781

Memorandum in Support of Renewed Motion for Reconsideration and Clarification – filed 06/16/2015Vol. XXIV - 2783

Memorandum Decision and Order Granting Motion for Entry of Final Judgment – filed 06/23/2015 ..... Vol. XXIV - 2791

Defendants North Idaho Resorts, LLC and VP, Incorporated's Motion for Enlargement of Time to File Reply to Plaintiff's  
Opposition to North Idaho Resorts, LLC and VP, Inc.'s Renewed Motion for Reconsideration and Clarification – filed  
07/06/2015 ..... Vol. XXIV - 2799

Memorandum in Opposition to North Idaho Resorts, LLC and VP, Inc.'s Renewed Motion for Reconsideration and  
Clarification – filed 07/06/2015 ..... Vol. XXIV - 2804

Memorandum in Opposition to JV, LLC's Motion to Alter, Amend and to Reconsider the Court's Memorandum Decision and  
Order Filed 04/14/2015 – filed 07/06/2015 ..... Vol. XXIV - 2820

Reply Memorandum in Support of Renewed Motion for Reconsideration and Clarification – filed 07/07/2015 ... Vol. XXIV -  
2837

Objection to Proposed Final Judgment – filed 07/07/2015 ..... Vol. XXIV - 2844

JV, LLC's Objection to Entry of Final Judgment – as Drafted by Valiant; and Request for a Hearing – filed 07/07/2015Vol.  
XXIV - 2847

Memorandum Decision and Order re: 1) JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated's Motions to Reconsider  
2) Valiant's Request for Entry of Proposed Final Judgment and Decree of Foreclosure and Sale – filed 07/21/2015 Vol.  
XXIV - 2856

Valiant Idaho, LLC's Motion for an Order of Sale of Real Property – filed 07/22/2015 ..... Vol. XXV - 2880

Memorandum in Support of Valiant Idaho, LLC's Motion for an Order of Sale of Real Property – filed 07/22/2015 Vol. XXV  
- 2912

Declaration of C. Dean Shafer in Support of Valiant Idaho, LLC's Motion for an Order of Sale of Real Property – filed  
07/22/2015 ..... Vol. XXV - 2926

Declaration of Charles W. Reeves in Support of Valiant Idaho, LLC's Motion for an Order of Sale of Real Property – filed 07/22/2015 .....	Vol. XXV - 2959
JV, LLC's Motion to Alter, Amend, and Reconsider the Court's Memorandum Decision and Order re: JV, LLC's Motions to Reconsider, and JV, LLC's Motion for Partial Summary Judgment for Affirmative Relief Concerning JV, LLC's Redemption Deed and as to Valiant's Redemption Deed; and Request for Hearing – filed 07/30/2015 .....	Vol. XXV - 2967
Objection to Motion for an Order of Sale of Real Property – filed 08/04/2015 .....	Vol. XXV - 2981
Declaration of Richard Villelli in Opposition to Valiant Idaho, LLC's Motion for Order of Sale – filed 08/04/2015	Vol. XXVI - 2987
Decree of Foreclosure – filed 08/05/2015 .....	Vol. XXVI - 3075
Judgment – filed 08/05/2015 .....	Vol. XXVI - 3082
JV, LLC's Defendants Trial Exhibit – filed 08/11/2015 .....	Vol. XXVI - 3088
JV, LLC's Motion to Reconsider, Alter, and Amend the Judgment [Rule 11 (b) and Rule 52 (b)]; and Request for Hearing – filed 08/18/2015 .....	Vol. XXVI - 3095
North Idaho Resorts, LLC and VP, Inc.'s Motion to Reconsider and Motion to Alter and Amend Judgment – filed 08/19/2015 .....	Vol. XXVII - 3114
North Idaho Resorts, LLC and VP, Inc.'s Memorandum in Support of Motion to Reconsider and Motion to Alter and Amend Judgment – filed 08/19/2015 .....	Vol. XXVII - 3116
Affidavit of Susan P. Weeks in Support of North Idaho Resorts, LLC and VP, Inc.'s Motion to Reconsider and Motion to Alter and Amend Judgment – filed 08/19/2015 .....	Vol. XXVII - 3133
Valiant Idaho, LLC's Motion to Amend Decree of Foreclosure – filed 08/19/2015 .....	Vol. XXVII - 3240
Memorandum in Support of Valiant Idaho, LLC's Motion to Amend Decree of Foreclosure – filed 08/19/2015	Vol. XXVII - 3244
Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015	Vol. XXVII - 3249
Memorandum in Support of Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3253
Declaration of Chad M. Nicholson in Support of Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3276
Declaration of Charles W. Reeves in Support of Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3280
Declaration of C. Dean Shafer in Support of Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3301
Notice of Hearing on Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3329
Notice of Special Appearance – filed 08/21/2015 .....	Vol. XXVIII - 3334
VP Incorporated's Answer to JV, LLC's Cross-Claim – filed 08/21/2015 .....	Vol. XXVIII - 3337

Stipulation for Settlement and for Judgment as Between Defendant VP, Inc. and North Idaho Resorts and the Defendant JV, LLC – filed 08/24/2015 .....	Vol. XXVIII - 3340
Memorandum in Opposition to JV, LLC’s Motion to Alter, Amend and to Reconsider filed 08/18/2015 – filed 08/25/2015 .....	Vol. XXVIII - 3367
Memorandum in Opposition to JV, LLC’s Motion to Alter, Amend and to Reconsider the Court’s Memorandum Decision and Order dated July 21, 2015 – filed 08/26/2015 .....	Vol. XXVIII - 3376
JV’s Supplemental Motion to Alter, Amend, Set Aside the Judgment, Based on Valiant’s Motions to Change the Order of Sale and Change the Decree of Foreclosure Pursuant to Rules 11 (b); 52 (b) and Rule 60 and Notice of Hearing – filed 08/26/2015 .....	Vol. XXIX - 3386
Affidavit of James Berry on Behalf of JV, LLC – filed 08/26/2015 .....	Vol. XXIX - 3401
North Idaho Resorts, LLC and VP, Inc.’s Memorandum in Opposition to Valiant Idaho’s Motion to Amend Degree of Foreclosure and Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/26/2015	Vol. XXIX - 3413
Declaration of Richard Villelli in Opposition to Valiant Idaho, LLC’s Motion to Alter, Amend and/or Reconsider the Order of Sale – filed 08/26/2015 .....	Vol. XXIX - 3424
Errata to Declaration of Richard Villelli in Opposition to Valiant Idaho, LLC’s Motion to Alter, Amend and/or Reconsider the Order of Sale – filed 08/27/2015 .....	Vol. XXIX - 3487
JV’s Reply to Valiant’s Memorandum in Opposition to JV’s Motion filed on 07/21/2015, and Motions to Strike – filed 08/31/2015 .....	Vol. XXIX - 3499
Order Setting Trial and Pretrial Order – filed 09/03/2015 .....	Vol. XXX - 3521
Memorandum Decision and Order Granting in Part Reconsideration of the July 21, 2015 Memorandum Decision & Order – filed 09/04/2015 .....	Vol. XXX - 3527
JV, LLC’s Request for Clerk’s Minutes and Reporter’s Typed Transcript of Entire Proceeding Including the District Court’s Remarks and Rulings in Open Court on September 2, 2015 – filed 09/08/2015 .....	Vol. XXX - 3533
Valiant Idaho, LLC’s Objection to JV, LLC’s Proposed Judgment Submitted 09/10/2015 (As Between Defendants JV, LLC and North Idaho Resorts, LLC/VP Incorporated) – filed 09/16/2015 .....	Vol. XXX - 3538
Notice re: Proposed Judgment (as Between Defendant VP, Inc. and North Idaho Resorts and the Defendant JV, LLC) – filed 09/17/2015 .....	Vol. XXX - 3545
Order Vacating Decree of Foreclosure Entered on August 5, 2015 – filed 09/17/2015 .....	Vol. XXX - 3549
Order Vacating Judgment Entered on August 5, 2015 – filed 09/17/2015 .....	Vol. XXX - 3552
Subpoena Duces Tecum to First American Tile Company – filed 09/18/2015 .....	Vol. XXX - 3555
Second Subpoena Duces Tecum to First American Title Company – filed 09/18/2015 .....	Vol. XXX - 3620
Valiant Idaho, LLC’s Third Motion for Summary Judgment – filed 09/25/2015 .....	Vol. XXX - 3623
Memorandum in Support of Valiant Idaho, LLC’s Third Motion for Summary Judgment – filed 09/25/2015	Vol. XXXI - 3627
Declaration of Barney Ng in Support of Valiant Idaho, LLC’s Third Motion for Summary Judgment – filed 09/25/2015	Vol. XXXI - 3658

Valiant Idaho, LLC's Objections and Opposition to North Idaho Resorts, LLC and VP, Incorporated's Motion to Reconsider and Motion to Alter and Amend Judgment – filed 10/01/2015 .....	Vol. XXXI - 3721
Affidavit of Service (Sandpoint Title Insurance) – filed 10/05/2015 .....	Vol. XXXI - 3727
Affidavit of Service (First American Title) – filed 10/05/2015 .....	Vol. XXXI - 3729
Affidavit of Service (Second on First American Title) – filed 10/05/2015 .....	Vol. XXXI - 3731
Valiant Idaho, LLC's Motion to Strike Inadmissible Evidence – filed 10/09/2015 .....	Vol. XXXI - 3733
Memorandum in Support of Valiant Idaho, LLC's Motion to Strike Inadmissible Evidence – filed 10/09/2015	Vol. XXXI - 3737
Defendants North Idaho Resorts, LLC and VP, Incorporated's Motion for Enlargement of Time to File Reply to Plaintiff's Opposition to North Idaho Resorts, LLC and VP, Inc.'s Renewed Motion for Reconsideration and Clarification – filed 10/13/2015 .....	Vol. XXXI - 3746
JV, LLC's Objection and Memorandum in Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment and JV, LLC's Motion to Strike Valiant's Third Motion for Summary Judgment and Notice of Hearing for October 23, 2015 at 1:30 p.m. – filed 10/13/2015 .....	Vol. XXXII - 3748
Affidavit of James Berry on Behalf of JV, LLC in Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment – filed 10/13/2015 .....	Vol. XXXII - 3778
Declaration of Susan P. Weeks in Opposition to Valiant's Third Motion for Summary Judgment – filed 10/13/2015	Vol. XXXII - 3791
Defendants North Idaho Resorts, LLC and VP Incorporated's Memorandum in Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment – filed 10/13/2015.....	Vol. XXXII - 3810
Defendants North Idaho Resorts and VP, Incorporated's Motion for Judicial Notice of Barney Ng – filed 10/13/2015	Vol. XXXII - 3823
Declaration of Richard Vilelli in Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 10/14/2015 .....	Vol. XXXII - 3828
Motion to Strike Memoranda and Declarations/Affidavits in Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment or, in the Alternative, Motion for Extension of Time to File Reply Memoranda – filed 10/16/2015	Vol. XXXII - 3864
Declaration of Chad M. Nicholson dated October 16, 2015 – filed 10/16/2015.....	Vol. XXXII - 3870
Defendants North Idaho Resorts, LLC and VP, Incorporated's Memorandum in Opposition to Valiant Idaho, LLC's Motion to Strike Inadmissible Evidence – filed 10/16/2015 .....	Vol. XXXII - 3879
JV, LLC's Response to Valiant's Motion to Strike Inadmissible Evidence – filed 10/19/2015 .....	Vol. XXXIII - 3884
Memorandum in Reply to Defendant JV, LLC's Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment – filed 10/20/2015 .....	Vol. XXXIII - 3892
Memorandum in Opposition to Defendant JV, LLC's Motion to Vacate Valiant's Hearing on October 23, 2015 – filed 10/20/2015 .....	Vol. XXXIII - 3900
Declaration of Barney Ng in Support of Valiant Idaho, LLC's Reply to North Idaho Resorts, LLC's and VP, Incorporated's Opposition to Valiant, Idaho, LLC's Third Motion for Summary Judgment – filed 10/20/2015 .....	Vol. XXXIII - 3906

Motion to Shorten Time to Have Heard Valiant Idaho, LLC's Second Motion to Strike Inadmissible Evidence – filed 10/20/2015 .....	Vol. XXXIII - 3911
Declaration of Chad M. Nicholson dated October 20, 2015 – filed 10/20/2015.....	Vol. XXXIII - 3914
Memorandum in Reply to North Idaho Resorts, Inc. and VP, Incorporated's Opposition to Valiant, Idaho, LLC's Third Motion for Summary Judgment – filed 10/20/2015.....	Vol. XXXIII - 3924
Valiant Idaho, LLC's Second Motion to Strike Inadmissible Evidence – filed 10/20/2015 .....	Vol. XXXIII - 3940
Memorandum in Support of Valiant Idaho, LLC's Second Motion to Strike Inadmissible Evidence – filed 10/20/2015 Vol. XXXIII - 3945	
Amended Notice of Trial – filed 10/21/2015.....	Vol. XXXIII - 3953
Reply to JV, LLC's Response to Valiant Idaho, LLC's Motion to Strike Inadmissible Evidence – filed 10/21/2015.. Vol. XXXIII - 3955	
Reply to Defendants North Idaho Resorts, LLC's and VP, Incorporated's Memorandum in Opposition to Valiant Idaho, LLC's Motion to Strike Inadmissible Evidence – filed 10/21/2015 .....	Vol. XXXIII - 3962
JV, LLC's Response to Valiant's Most Recent "Filings" and JV, LLC's Objection Thereto – filed 10/21/2015 Vol. XXXIII - 3972	
North Idaho Resorts, LLC and VP, Inc.'s Reply Memorandum in Support of Motion to Reconsider and Motion to Alter and Amend Judgment – filed 10/22/2015.....	Vol. XXXIII - 3982
Motion for Enlargement of Time to File North Idaho Resorts, LLC and VP, Inc.'s Reply Memorandum in Support of Motion to Reconsider and Motion to Alter and Amend Judgment – filed 10/22/2015 .....	Vol. XXXIII - 3986
Errata to Declaration of Susan P. Weeks in Opposition to Valiant's Third Motion for Summary Judgment – filed 10/22/2015 .....	Vol. XXXIII - 3988
Defendants North Idaho Resorts, LLC and VP, Incorporated's Memorandum in Opposition to Valiant Idaho, LLC's Second Motion to Strike Inadmissible Evidence – filed 10/22/2015 .....	Vol. XXXIII - 3990
Defendants North Idaho Resorts, LLC and VP, Incorporated's Motion to Strike the Declarations of Barney Ng and Chad M. Nicholson – filed 10/22/2015 .....	Vol. XXXIII - 3995
Defendants North Idaho Resorts, LLC and VP, Incorporated's Memorandum in Support of Motion to Strike the Declarations of Barney Ng and Chad M. Nicholson – filed 10/22/2015 .....	Vol. XXXIII - 3997
Memorandum Decision & Order re: Motions Heard on October 23, 2015 – filed 10/30/2015 .....	Vol. XXXIII - 4000
VP, Inc.'s Expert Witness Disclosure – filed 11/27/2015 .....	Vol. XXXIV - 4020
VP, Inc.'s Lay Witness Disclosure – filed 11/27/2015.....	Vol. XXXIV - 4024
VP, Inc.'s Supplemental Expert Witness Disclosure – filed 12/04/2015 .....	Vol. XXXIV - 4027
Valiant Idaho, LLC's Motion <i>In Limine</i> re: North Idaho Resorts, LLC and VP, Inc. – filed 12/15/2015 Vol. XXXIV - 4032	
Valiant Idaho, LLC's Motion <i>In Limine</i> re: JV, LLC – filed 12/15/2015.....	Vol. XXXIV - 4034
Memorandum in Support of Valiant Idaho, LLC's Motion <i>In Limine</i> re: North Idaho Resorts, LLC and VP, Inc. – filed 12/15/2015.....	Vol. XXXIV - 4036



Memorandum in Support of Valiant Idaho, LLC's Motion <i>In Limine</i> re: North Idaho Resorts, LLC and VP, Inc.(Continued) – filed 12/15/2015 .....	Vol. XXXV - 4036
Memorandum in Support of Valiant Idaho, LLC's Motion <i>In Limine</i> re: JV, LLC – filed 12/15/2015.....	Vol. XXXV - 4051
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motions <i>In Limine</i> – filed 12/15/2015	Vol. XXXV - 4057
JV, LLC's Amended Exhibit List and Documents – filed 12/22/2015 .....	Vol. XXXV - 4205
VP, Inc.'s and North Idaho Resorts, LLC's Response to Valiant's Motion <i>In Limine</i> – filed 12/22/2015 .....	Vol. XXXV - 4221
JV, LLC's Objection to Valiant's Motion <i>In Limine</i> – filed 12/23/2015 .....	Vol. XXXV - 4233
Reply Memorandum in Support of Valiant Idaho, LLC's Motion <i>In Limine</i> re: North Idaho Resorts, LLC and VP, Inc. – filed 12/28/2015 .....	Vol. XXXV - 4243
Reply Memorandum in Support of Valiant Idaho, LLC's Motion <i>In Limine</i> re: JV, LLC – filed 12/28/2015	Vol. XXXV - 4253
Declaration of Chad M. Nicholson in Support of Valiant Idaho, LLC's Reply Memoranda re: Motions <i>In Limine</i> – filed 12/28/2015 .....	Vol. XXXV - 4258
Order re: Valiant Idaho LLC's Motions <i>In Limine</i> – filed 12/29/2015 .....	Vol. XXXV - 4266
VP, Inc.'s Amended Supplemental Expert Witness Disclosure – filed 01/08/2016 .....	Vol. XXXV - 4269
VP, Inc.'s Amended Supplemental Expert Witness Disclosure – filed 01/11/2016 .....	Vol. XXXV - 4273
VP, Inc.'s Exhibit List – filed 01/14/2016 .....	Vol. XXXVI - 4278
Valiant Idaho, LLC's Identification of Trial Exhibits – filed 01/14/2016 .....	Vol. XXXVI - 4286
Valiant Idaho, LLC's Identification of Trial Witnesses – filed 01/14/2016 .....	Vol. XXXVI - 4294
VP, Inc.'s Amended Exhibit List – filed 01/15/2016.....	Vol. XXXVI - 4298
Valiant Idaho, LLC's Trial Brief – filed 01/21/2016 .....	Vol. XXXVI - 4306
JV, LLC's Trial Memorandum – filed 01/22/2016 .....	Vol. XXXVI - 4316
JV, LLC's Second Amended Exhibit List and Documents – filed 01/22/2016 .....	Vol. XXXVI - 4363
Valiant Idaho, LLC's Trial Brief – filed 01/25/2016 .....	Vol. XXXVI - 4394
JV, LLC's Third Amended Exhibit List and Documents – filed 01/26/2016 .....	Vol. XXXVI - 4404
VP, Inc.'s Motion to Amend Answer to Assert an Affirmative Defense – filed 01/27/2016 .....	Vol. XXXVII - 4413
JV, LLC's Fourth Amended Exhibit List and Documents – filed 03/11/2016 .....	Vol. XXXVII - 4418
Valiant Idaho, LLC's Closing Argument – filed 03/14/2016 .....	Vol. XXXVII - 4444
Declaration of William Haberman in Support of Valiant Idaho, LLC's Closing Argument – filed 03/14/2016	Vol. XXXVII - 4471
JV, LLC's Motion to Strike the Declaration of William Haberman – filed 04/18/2016.....	Vol. XXXVII - 4476

VP Inc.'s Motion to Strike the Declaration of William Haberman – filed 04/21/2016 .....	Vol. XXXVII - 4482
Memorandum in Support of VP, Inc.'s Motion to Strike the Declaration of William Haberman – filed 04/21/2016 .	Vol. XXXVII - 4484
Order Denying Motions to Strike – filed 04/27/2016 .....	Vol. XXXVII - 4487
JV, LLC's Post Trial Memorandum and Argument – filed 05/12/2016 .....	Vol. XXXVII - 4489
VP's Closing Argument – filed 05/12/2016 .....	Vol. XXXVII - 4535
Valiant Idaho, LLC's Response and Rebuttal to VP, Inc.'s Closing Argument – filed 05/26/2016	Vol. XXXVIII - 4551
Valiant Idaho, LLC's Response and Objections to JV, LLC's Post-trial Memorandum and Argument – filed 05/26/2016	Vol. XXXVII - 4574
Memorandum Decision and Order re: Court Trial held on January 28 and 29, and March 16 and 17, 2016 – filed 05/27/2016	Vol. XXXVII - 4589
Judgment – filed 06/22/2016 .....	Vol. XXXVII - 4619
Judgment (Continued) – filed 06/22/2016 .....	Vol. XXXIX - 4693
Judgment (Continued) – filed 06/22/2016 .....	Vol. XL - 4806
Decree of Foreclosure – filed 06/22/2016 .....	Vol. XL - 4910
Decree of Foreclosure (Continued) – filed 06/22/2016 .....	Vol. XLI - 4940
Valiant Idaho, LLC's Motion for an Order of Sale of Real Property – filed 06/22/2016 .....	Vol. XLI - 4985
Memorandum in Support of Valiant Idaho, LLC's Motion for Order of Sale of Real Property – filed 06/22/2016	Vol. XLI - 4997
Objection to Valiant Idaho's Second Motion for an Order of Sale of Real Property – filed 06/29/2016 .....	Vol. XLI - 5015
Valiant Idaho, LLC's Memorandum of Costs and Attorney's Fees – filed 07/06/2016 .....	Vol. XLI - 5019
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Memorandum of Costs and Attorney's Fees – filed 07/06/2016 .....	Vol. XLII - 5058
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Memorandum of Costs and Attorney's Fees – filed 07/06/2016 .....	Vol. XLIII - 5190
Order Requiring Submissions – filed 07/14/2016.....	Vol. XLIII - 5264
Order Vacating Judgment – filed 07/14/2016 .....	Vol. XLIII - 5266
Order Vacating Decree of Foreclosure entered on June 22, 2016 – filed 07/14/2016 .....	Vol. XLIII - 5268
Order re: Sale of Real Property – filed 07/14/2016 .....	Vol. XLIII - 5270
JV, LLC's Proposed Judgment and Decree of Foreclosure and JV, LLC's Request for Additional Time of at Least 14 Days – filed 07/15/2016.....	Vol. XLIII - 5274
Order re: Proposed Judgment and Proposed Decree of Foreclosure – filed 07/18/2016 .....	Vol. XLIII - 5303

JV, LLC's Objection and Motion to Disallow Valiant's Memorandum of Fees and Costs – filed 07/18/2016 Vol. XLIV - 5306

Decree of Foreclosure – filed 07/20/2016..... Vol. XLIV - 5317

Decree of Foreclosure (Continued) – filed 07/20/2016 ..... Vol. XLV - 5413

VP, Inc.'s Opposition to Valiant Idaho's Memorandum of Costs and Attorney Fees – filed 07/20/2016 ..... Vol. XLV - 5503

JV, LLC's Motion to Alter, Amend and Reconsider re: 1. Memorandum Decision and Order 2. Judgment 3. Decree of Foreclosure 4. Order of Sale, and JV, LLC's Memorandum in Support and Request for Hearing – filed 08/02/2016 Vol. XLV - 5521

Order Denying JV, LLC's Request for Oral Argument – filed 08/03/2016..... Vol. XLV - 5540

VP, Inc.'s Motion for a New Trial – filed 08/03/2016..... Vol. XLV - 5542

VP, Inc.'s Motion for New Trial – filed 08/03/2016 ..... Vol. XLV - 5544

Memorandum in Support of VP, Inc.'s Motion for New Trial – filed 08/03/2016..... Vol. XLV - 5546

Declaration of Weeks in Support of VP, Inc.'s Motion for New Trial – filed 08/03/2016..... Vol. XLVI - 5550

VP, Inc.'s Motion to Alter, Amend, and Reconsider the Decree of Foreclosure and Judgment – filed 08/03/2016 Vol. XLVI - 5553

Memorandum in Support of VP, Inc.'s Motion to Alter, Amend, and Reconsider the Decree of Foreclosure and Judgment – filed 08/04/2016..... Vol. XLVI - 5555

Order Denying VP, Inc.'s Request for Oral Argument on Motion to Alter, Amend and Reconsider – filed 08/04/2016Vol. XLVI - 5575

Valiant Idaho, LLC's Memorandum in Opposition to VP, Inc.'s Motion for a New Trial – filed 08/10/2016 Vol. XLVI - 5577

Valiant Idaho, LLC's Memorandum in Opposition to JV, LLC's Motion to Alter, Amend, and Reconsider re: (1) Memorandum Decision and Order; (2) Judgment; (3) Decree of Foreclosure; and (4) Order of Sale – filed 08/10/2016 Vol. XLVI - 5584

Declaration of Richard Stacey in Support of Valiant Idaho, LLC's Memorandum Responses to VP, Inc.'s and JV, LLC's Objections and Motions to Disallow Memorandum of Costs and Attorney's Fees – filed 08/10/2016 .. Vol. XLVI - 5591

Valiant Idaho, LLC's Memorandum in Opposition to VP, Inc.'s Motion to Alter, Amend and Reconsider the Decree of Foreclosure and Judgment – filed 08/10/2016 ..... Vol. XLVI - 5673

Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 08/10/2016 ..... Vol. XLVI - 5682

Declaration of Richard Stacey in Support of Valiant Idaho, LLC's Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 08/10/2016 ..... Vol. XLVII - 5685

Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Inc.'s Motion for a New Trial – filed 08/10/2016 ..... Vol. XLVII - 5714

Valiant Idaho, LLC's Memorandum in Opposition to JV, LLC's Objection and Motion to Disallow Memorandum of Costs and Attorney's Fees – filed 08/11/2016 ..... Vol. XLVII - 5728

Valiant Idaho, LLC's Memorandum in Response to VP, Inc.'s Objection and Motion to Disallow Memorandum of Costs and Attorney's Fees – filed 08/11/2016..... Vol. XLVII - 5746

Valiant Idaho, LLC's Memorandum in Support of Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 08/11/2016 .....	Vol. XLVII - 5770
Reply Memorandum to Valiant's Opposition to Motion for New Trial – filed 08/15/2016 .....	Vol. XLVII - 5787
Memorandum Decision and Order Denying JV, LLC's and VP, Incorporated's Motions to Alter, Amend and Reconsider – filed 08/16/2016 .....	Vol. XLVII - 5793
Memorandum Decision and Order Denying JV, LLC's and VP, Incorporated's Motions to Alter, Amend and Reconsider (Continued) – filed 08/16/2016 .....	Vol. XLVIII - 5815
Memorandum Decision Order Awarding Costs and Attorney's Fees to Valiant Idaho, LLC – filed 08/22/2016	Vol. XLVIII - 5829
Judgment re: Costs and Attorneys' Fees – filed 08/22/2016 .....	Vol. XLVIII - 5844
JV, LLC's Response, Objection and Opposition to Plaintiff's Motion for Sanctions – filed 08/24/2016	Vol. XLVIII - 5847
Declaration of Daniel M. Keyes in Support of VP and NIR's Opposition to Valiant Idaho's Motion for Sanctions – filed 08/24/2016 .....	Vol. XLVIII - 5868
Defendant VP, Inc.'s and NIR, LLC's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Sanctions – filed 08/24/2016 .....	Vol. XLVIII - 5886
Memorandum Decision Order Denying VP, Inc.'s Motion for New Trial – filed 08/25/2016 .....	Vol. XLVIII - 5906
JV, LLC's Correction to its Response, Objection and Opposition to Plaintiff's Motion for Sanctions – filed 08/25/2016	Vol. XLVIII - 5920
Memorandum Decision Order Denying Valiant Idaho, LLC's Motion for Sanctions – filed 08/29/2016	Vol. XLVIII - 5925
Notice of Appeal (NIR) – filed 09/09/2016 .....	Vol. IL - 5941
Notice of Appeal (NIR) (Continued) – filed 09/09/2016 .....	Vol. L - 6041
Notice of Appeal by JV, LLC – filed 09/20/2016 .....	Vol. LI - 6137
Notice of Appeal by JV, LLC (Continued) – filed 09/20/2016 .....	Vol. LII - 6267
Writ of Execution – filed 09/21/2016 .....	Vol. LII - 6318
Writ of Execution (Continued) – filed 09/21/2016 .....	Vol. LIII - 6396
Sheriff's Service on Writ of Execution – filed 09/21/2016 .....	Vol. LIII - 6507
Notice of Levy Under Writ of Execution – filed 09/21/2016 .....	Vol. LIII - 6508
Notice of Sheriff's Sale – filed 09/21/2016 .....	Vol. LIV - 6531
Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/21/2016 .....	Vol. LIV - 6562
Memorandum in Support of Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/21/2016	Vol. LIV - 6566
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/21/2016 .....	Vol. LIV - 6573

Notice of Denial of Oral Argument for Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/23/2016 .....	Vol. LIV - 6578
Valiant Idaho, LLC's Request for Additional Transcript and Record on Appeal – filed 09/23/2016 .....	Vol. LIV - 6581
JV, LLC's Objection to Valiant's Motion for Relief from Automatic Stay and Memorandum in Support – filed 09/26/2016 .....	Vol. LIV - 6589
VP, Inc. and NIR, LLC's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/28/2016 .....	Vol. LIV - 6597
Memorandum in Reply to: (1) JV, LLC's Objection; and (2) VP, Inc. and North Idaho Resorts, LLC's Opposition to Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/29/2016 .....	Vol. LIV - 6603
Application and Declaration of Richard L. Stacey for Writ of Execution – filed 10/05/2016 .....	Vol. LIV - 6608
Writ of Execution – filed 10/05/2016 .....	Vol. LIV - 6611
Writ of Execution (Continued) – filed 10/05/2016 .....	Vol. LV - 6667
Writ of Execution (Continued) – filed 10/05/2016 .....	Vol. LVI - 6801
Application and Declaration of Richard L. Stacey for Writ of Execution Against North Idaho Resorts, LLC – filed 10/06/2016 .....	Vol. LVI - 6804
Writ of Execution Against North Idaho Resorts, LLC – filed 10/06/2016 .....	Vol. LVI - 6806
Application and Declaration of Richard L. Stacey for Writ of Execution Against JV, LLC – filed 10/06/2016 .....	Vol. LVI - 6812
Writ of Execution Against JV, LLC – filed 10/06/2016 .....	Vol. LVI - 6814
Application and Declaration of Richard L. Stacey for Writ of Execution Against VP, Incorporated – filed 10/06/2016 .....	Vol. LVI - 6820
Writ of Execution Against VP, Incorporated – filed 10/06/2016 .....	Vol. LVI - 6822
Notice of Appeal (VP, Inc.) – filed 10/06/2016 .....	Vol. LVI - 6828
Notice of Appeal (VP, Inc.) (Continued) – filed 10/06/2016 .....	Vol. LVII - 6932
Notice of Amended Appeal (NIR, LLC) – filed 10/06/2016 .....	Vol. LVII - 7031
Notice of Amended Appeal (NIR, LLC) (Continued) – filed 10/06/2016 .....	Vol. LVIII - 7071
Notice of Amended Appeal (NIR, LLC) (Continued) – filed 10/06/2016 .....	Vol. LIX - 7212
Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 10/07/2016 .....	Vol. LIX - 7230
Valiant Idaho, LLC's Request for Additional Transcript and Record on Appeal – filed 10/07/2016 .....	Vol. LIX - 7238
Application and Declaration of Richard L. Stacey for Writ of Execution Against JV, LLC for Boundary County – filed 10/13/2016 .....	Vol. LIX - 7253
Writ of Execution Against JV, LLC for Boundary County – filed 10/13/2016 .....	Vol. LIX - 7255

Application and Declaration of Richard L. Stacey for Writ of Execution Against North Idaho Resorts, LLC for Boundary County – filed 10/13/2016 ..... Vol. LIX - 7258

Writ of Execution Against North Idaho Resorts, LLC for Boundary County – filed 10/13/2016 ..... Vol. LIX - 7260

Application and Declaration of Richard L. Stacey for Writ of Execution Against VP, Incorporated for Boundary County – filed 10/13/2016 ..... Vol. LIX - 7263

Writ of Execution Against VP, Incorporated for Boundary County – filed 10/13/2016..... Vol. LIX - 7265

Valiant Idaho, LLC’s Request for Additional Transcript and Record on Appeal – filed 10/20/2016 ..... Vol. LIX - 7268

Valiant Idaho, LLC’s Amended Request for Additional Transcript and Record on Appeal – filed 10/20/2016Vol. I - 7279

Notice of Levy (268811) – filed 10/31/2016 ..... Vol. LIX - 7283

Writ of Execution Against VP, Incorporated for Boundary County (268811) – filed 10/31/2016..... Vol. LIX - 7285

Notice of Sheriff’s Sale (268812) – filed 10/31/2016..... Vol. LIX - 7288

Notice of Levy (268813) – filed 10/31/2016 ..... Vol. LIX - 7291

Writ of Execution Against North Idaho Resorts, LLC for Boundary County (268813) – filed 10/31/2016 ..... Vol. LIX - 7294

Notice of Sheriff’s Sale (268814) – filed 10/31/2016..... Vol. LIX - 7297

Notice of Levy (268815) – filed 10/31/2016 ..... Vol. LIX - 7300

Writ of Execution Against JV, LLC for Boundary County (268815) – filed 10/31/2016 ..... Vol. LIX - 7303

Notice of Sheriff’s Sale (268816) – filed 10/31/2016..... Vol. LIX - 7306

Cash Bond posted by JV, LLC \$21,154.60 – posted 11/02/2016 ..... Vol. LIX - 7309

JV, LLC’s Motion and Application for Stay of Execution Upon Posting a Cash Deposit by JV, LLC [IAR 13 (b) 15] – filed 11/02/2016 ..... Vol. LIX - 7311

JV, LLC’s Third Party Claim (Idaho Code 11-203) – filed 11/02/2016..... Vol. LX - 7341

Notice of Hearing – filed 11/03/2016 ..... Vol. LX - 7357

Valiant Idaho, LLC’s Motion Contesting JV, LLC’s Third Party Claim; and Opposition to JV, LLC’s Motion for Stay of Execution – filed 11/03/2016..... Vol. LX - 7361

Memorandum in Support of Valiant Idaho, LLC’s Motion Contesting JV, LLC’s Third Party Claim; and Opposition to JV, LLC’s Motion for Stay of Execution – filed 11/03/2016..... Vol. LX - 7364

Motion to Shorten Time to Have Heard Valiant Idaho, LLC’s (1) Motion Contesting JV, LLC’s Third Party Claim; and Opposition to JV, LLC’s Motion for Stay of Execution; and (2) Motion for Sanctions under IC 12-123 and IRCP 11 – filed 11/03/2016 ..... Vol. LX - 7369

Order Shortening Time to Have Heard Valiant Idaho, LLC’s (1) Motion Contesting JV, LLC’s Third Party Claim; and Opposition to JV, LLC’s Motion for Stay of Execution; and (2) Motion for Sanctions under IC 12-123 and IRCP 11 – filed 11/03/2016 ..... Vol. LX - 7372

Valiant Idaho, LLC’s Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 11/03/2016 ..... Vol. LX - 7375

Valiant Idaho, LLC's Memorandum in Support of Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 11/03/2016	Vol. LX - 7378
Supplemental Memorandum in Support of Valiant Idaho, LLC's Motion Contesting JV, LLC's Third Party Claim; and Opposition to JV, LLC's Motion for Stay of Execution – filed 11/04/2016	Vol. LX - 7387
Declaration of Sally Mitchell in Support of Supplemental Memorandum Supporting Valiant Idaho, LLC's Motion Contesting JV, LLC's Third Party Claim; and Opposition to JV, LLC's Motion for Stay of Execution – filed 11/04/2016	Vol. LX - 7392
Order re: JV, LLC's Third Party Claim and Motion for Stay of Execution – filed 11/04/2016	Vol. LX - 7399
Memorandum Decision Order Granting Valiant Idaho, LLC's Motion for Sanctions – filed 11/14/2016	Vol. LX - 7402
Sheriff's Certificate on Return of Service, Writ of Execution (NIR) – filed 11/18/2016	Vol. LX - 7411
Writ of Execution Against North Idaho Resorts, LLC for Boundary County – filed 11/18/2016	Vol. LX - 7413
Sheriff's Certificate on Return of Service, Writ of Execution (VP, Inc.)– filed 11/18/2016	Vol. LX - 7424
Writ of Execution Against VP, Incorporated for Boundary County – filed 11/18/2016	Vol. LX - 7426
Withdrawal of Application for Stay - filed 11/22/2016	Vol. LX - 7436
Valiant Idaho, LLC's Memorandum of Costs and Attorneys' Fees Against JV, LLC – filed 11/25/2016	Vol. LX - 7438
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Memorandum of Costs and Attorneys' Fees Against JV, LLC – filed 11/25/2016	Vol. LX - 7442
JV's Objection, and Motion to Disallow Valiant's Memorandum of Attorney Costs and Fees – filed 12/02/2016	Vol. LX - 7447
Order Imposing Rule 11 Sanctions – filed 12/06/2016	Vol. LX - 7458
Judgment re: Rule 11 Sanctions – filed 12/06/2016	Vol. LX - 7462
Writ of Execution – filed 12/22/2016	Vol. LXI - 7464
Writ of Execution (Continued) – filed 12/22/2016	Vol. LXII - 7594
Notice of Levy Under Writ of Execution – filed 12/22/2016	Vol. LXII - 7657
Sheriff's Return on Sale – filed 12/22/2016	Vol. LXII - 7680
Sheriff's Return on Writ of Execution – filed 12/22/2016	Vol. LXII - 7714
Notice of Sheriff's Sale – filed 12/22/2016	Vol. LXIII - 7715
Sheriff's Certificate of Sale (Idaho Club – Parcel 1) – filed 12/22/2016	Vol. LXII - 7747
Sheriff's Certificate of Sale (Idaho Club – Parcel 2) – filed 12/22/2016	Vol. LXII - 7750
Sheriff's Certificate of Sale (Idaho Club – Parcel 5) – filed 12/22/2016	Vol. LXII - 7754
Sheriff's Certificate of Sale (Idaho Club – Parcel 8) – filed 12/22/2016	Vol. LXII - 7761
Sheriff's Certificate of Sale (Idaho Club – Parcel 9) – filed 12/22/2016	Vol. LXII - 7764

Sheriff's Certificate of Sale (Idaho Club – Parcel 10) – filed 12/22/2016 .....	Vol. LXII - 7767
Sheriff's Certificate of Sale (Idaho Club – Parcel 11) – filed 12/22/2016 .....	Vol. LXII - 7770
Sheriff's Certificate of Sale (Idaho Club – Parcel 12) – filed 12/22/2016 .....	Vol. LXII - 7773
Sheriff's Certificate of Sale (Idaho Club – Parcel 13) – filed 12/22/2016 .....	Vol. LXII - 7776
Sheriff's Certificate of Sale (Idaho Club – Parcel 14) – filed 12/22/2016 .....	Vol. LXII - 7779
Sheriff's Certificate of Sale (Idaho Club – Parcel 15) – filed 12/22/2016 .....	Vol. LXII - 7782
Sheriff's Certificate of Sale (Idaho Club – Parcel 16) – filed 12/22/2016 .....	Vol. LXII - 7785
Sheriff's Certificate of Sale (Idaho Club – Parcel 17) – filed 12/22/2016 .....	Vol. LXII - 7788
Sheriff's Certificate of Sale (Idaho Club – Parcel 19) – filed 12/22/2016 .....	Vol. LXII - 7791
Sheriff's Certificate of Sale (Idaho Club – Parcel 20) – filed 12/22/2016 .....	Vol. LXII - 7795
Sheriff's Certificate of Sale (Idaho Club – Parcel 21) – filed 12/22/2016 .....	Vol. LXII - 7798
Sheriff's Certificate of Sale (Idaho Club – Parcel 22) – filed 12/22/2016 .....	Vol. LXII - 7801
Sheriff's Certificate of Sale (Idaho Club – Parcel 23) – filed 12/22/2016 .....	Vol. LXII - 7804
Sheriff's Certificate of Sale (Idaho Club – Parcel 24) – filed 12/22/2016 .....	Vol. LXII - 7807
Sheriff's Certificate of Sale (Idaho Club – Parcel 25) – filed 12/22/2016 .....	Vol. LXII - 7810
Sheriff's Certificate of Sale (Idaho Club – Parcel 26) – filed 12/22/2016 .....	Vol. LXII - 7813
Sheriff's Certificate of Sale (Idaho Club – Parcel 27) – filed 12/22/2016 .....	Vol. LXII - 7816
Sheriff's Certificate of Sale (Idaho Club – Parcel 28) – filed 12/22/2016 .....	Vol. LXII - 7819
Sheriff's Certificate of Sale (Idaho Club – Parcel 29) – filed 12/22/2016 .....	Vol. LXII - 7822
Sheriff's Certificate of Sale (Idaho Club – Parcel 30) – filed 12/22/2016 .....	Vol. LXII - 7825
Sheriff's Certificate of Sale (Idaho Club – Parcel 31) – filed 12/22/2016 .....	Vol. LXII - 7828
Sheriff's Certificate of Sale (Idaho Club – Parcel 32) – filed 12/22/2016 .....	Vol. LXII - 7831
Sheriff's Certificate of Sale (Idaho Club – Parcel 33) – filed 12/22/2016 .....	Vol. LXII - 7834
Sheriff's Certificate of Sale (Idaho Club – Parcel 34) – filed 12/22/2016 .....	Vol. LXII - 7837
Sheriff's Certificate of Sale (Idaho Club – Parcel 35) – filed 12/22/2016 .....	Vol. LXII - 7840
Sheriff's Certificate of Sale (Idaho Club – Parcel 36) – filed 12/22/2016 .....	Vol. LXII - 7843
Sheriff's Certificate of Sale (Idaho Club – Parcel 37) – filed 12/22/2016 .....	Vol. LXII - 7846
Sheriff's Certificate of Sale (Idaho Club – Parcel 38) – filed 12/22/2016 .....	Vol. LXII - 7849
Sheriff's Certificate of Sale (Idaho Club – Parcel 39) – filed 12/22/2016 .....	Vol. LXIV - 7852



Sheriff's Certificate of Sale (Idaho Club – Parcel 40) – filed 12/22/2016 ..... Vol. LXIV - 7855

Sheriff's Certificate of Sale (Idaho Club – Parcel 41) – filed 12/22/2016 ..... Vol. LXIV - 7858

Sheriff's Certificate of Sale (Idaho Club – Parcel 42) – filed 12/22/2016 ..... Vol. LXIV - 7861

Sheriff's Certificate of Sale (Idaho Club – Parcel 43) – filed 12/22/2016 ..... Vol. LXIV - 7864

Sheriff's Certificate of Sale (Idaho Club – Parcel 44) – filed 12/22/2016 ..... Vol. LXIV - 7867

Sheriff's Certificate of Sale (Idaho Club – Parcel 45) – filed 12/22/2016 ..... Vol. LXIV - 7870

Sheriff's Certificate of Sale (Idaho Club – Parcel 46) – filed 12/22/2016 ..... Vol. LXIV - 7873

Sheriff's Certificate of Sale (Idaho Club – Parcel 47) – filed 12/22/2016 ..... Vol. LXIV - 7876

Sheriff's Certificate of Sale (Idaho Club – Parcel 48) – filed 12/22/2016 ..... Vol. LXIV - 7879

Sheriff's Certificate of Sale (Idaho Club – Parcel 49) – filed 12/22/2016 ..... Vol. LXIV - 7881

Sheriff's Certificate of Sale (Idaho Club – Parcel 50) – filed 12/22/2016 ..... Vol. LXIV - 7884

Sheriff's Certificate of Sale (Idaho Club – Parcel 51) – filed 12/22/2016 ..... Vol. LXIV - 7887

Sheriff's Certificate of Sale (Idaho Club – Parcel 52) – filed 12/22/2016 ..... Vol. LXIV - 7890

Sheriff's Certificate of Sale (Idaho Club – Parcel 53) – filed 12/22/2016 ..... Vol. LXIV - 7893

Sheriff's Certificate of Sale (Idaho Club – Parcel 54) – filed 12/22/2016 ..... Vol. LXIV - 7896

Sheriff's Certificate of Sale (Idaho Club – Parcel 55) – filed 12/22/2016 ..... Vol. LXIV - 7899

Sheriff's Certificate of Sale (Idaho Club – Parcel 56) – filed 12/22/2016 ..... Vol. LXIV - 7902

Sheriff's Certificate of Sale (Idaho Club – Parcel 57) – filed 12/22/2016 ..... Vol. LXIV - 7905

Sheriff's Certificate of Sale (Idaho Club – Parcel 58) – filed 12/22/2016 ..... Vol. LXIV - 7908

Sheriff's Certificate of Sale (Idaho Club – Parcel 59) – filed 12/22/2016 ..... Vol. LXIV - 7911

Sheriff's Certificate of Sale (Idaho Club – Parcel 60) – filed 12/22/2016 ..... Vol. LXIV - 7914

Sheriff's Certificate of Sale (Idaho Club – Parcel 61) – filed 12/22/2016 ..... Vol. LXIV - 7917

Sheriff's Certificate of Sale (Idaho Club – Parcel 62) – filed 12/22/2016 ..... Vol. LXIV - 7920

Sheriff's Certificate of Sale (Idaho Club – Parcel 63) – filed 12/22/2016 ..... Vol. LXIV - 7923

Sheriff's Certificate of Sale (Idaho Club – Parcel 64) – filed 12/22/2016 ..... Vol. LXIV - 7926

Sheriff's Certificate of Sale (Idaho Club – Parcel 65) – filed 12/22/2016 ..... Vol. LXIV - 7929

Sheriff's Certificate of Sale (Idaho Club – Parcel 66) – filed 12/22/2016 ..... Vol. LXIV - 7932

Sheriff's Certificate of Sale (Idaho Club – Parcel 67) – filed 12/22/2016 ..... Vol. LXIV - 7935

Sheriff's Certificate of Sale (Idaho Club – Parcel 68) – filed 12/22/2016 ..... Vol. LXIV - 7938

Sheriff's Certificate of Sale (Idaho Club – Parcel 69) – filed 12/22/2016 .....	Vol. LXIV - 7942
Sheriff's Certificate of Sale (Idaho Club – Parcel 70) – filed 12/22/2016 .....	Vol. LXIV - 7945
Sheriff's Certificate of Sale (Idaho Club – Parcel 71) – filed 12/22/2016 .....	Vol. LXIV - 7950
Sheriff's Certificate of Sale (Idaho Club – Parcel 72) – filed 12/22/2016 .....	Vol. LXIV - 7954
Sheriff's Certificate of Sale (Idaho Club – Parcel 73) – filed 12/22/2016 .....	Vol. LXIV - 7957
Sheriff's Certificate of Sale (Idaho Club – Parcel 74) – filed 12/22/2016 .....	Vol. LXIV - 7960
Sheriff's Certificate of Sale (Idaho Club – Parcel 75) – filed 12/22/2016 .....	Vol. LXIV - 7963
Sheriff's Certificate of Sale (Idaho Club – Parcel 76) – filed 12/22/2016 .....	Vol. LXIV - 7966
Sheriff's Certificate of Sale (Idaho Club – Parcel 77) – filed 12/22/2016 .....	Vol. LXIV - 7969
Sheriff's Certificate of Sale (Idaho Club – Parcel 78) – filed 12/22/2016 .....	Vol. LXIV - 7972
Sheriff's Certificate of Sale (Idaho Club – Parcel 79) – filed 12/22/2016 .....	Vol. LXIV - 7975
Sheriff's Certificate of Sale (Idaho Club – Parcel 80) – filed 12/22/2016 .....	Vol. LXIV - 7978
Sheriff's Certificate of Sale (Idaho Club – Parcel 81) – filed 12/22/2016 .....	Vol. LXIV - 7981
Sheriff's Certificate of Sale (Idaho Club – Parcel 82) – filed 12/22/2016 .....	Vol. LXIV - 7984
Sheriff's Certificate of Sale (Idaho Club – Parcel 83) – filed 12/22/2016 .....	Vol. LXV - 7987
Sheriff's Certificate of Sale (Idaho Club – Parcel 84) – filed 12/22/2016 .....	Vol. LXV - 7990
Sheriff's Certificate of Sale (Idaho Club – Parcel 85) – filed 12/22/2016 .....	Vol. LXV - 7993
Sheriff's Certificate of Sale (Idaho Club – Parcel 86) – filed 12/22/2016 .....	Vol. LXV - 7996
Sheriff's Certificate of Sale (Idaho Club – Parcel 87) – filed 12/22/2016 .....	Vol. LXV - 7999
Sheriff's Certificate of Sale (Idaho Club – Parcel 88) – filed 12/22/2016 .....	Vol. LXV - 8002
Sheriff's Certificate of Sale (Idaho Club – Parcel 89) – filed 12/22/2016 .....	Vol. LXV - 8005
Sheriff's Certificate of Sale (Idaho Club – Parcel 90) – filed 12/22/2016 .....	Vol. LXV - 8008
Sheriff's Certificate of Sale (Idaho Club – Parcel 91) – filed 12/22/2016 .....	Vol. LXV - 8011
Sheriff's Certificate of Sale (Idaho Club – Parcel 92) – filed 12/22/2016 .....	Vol. LXV - 8014
Sheriff's Certificate of Sale (Idaho Club – Parcel 93) – filed 12/22/2016 .....	Vol. LXV - 8017
Sheriff's Certificate of Sale (Idaho Club – Parcel 94) – filed 12/22/2016 .....	Vol. LXV - 8020
Sheriff's Certificate of Sale (Idaho Club – Parcel 95) – filed 12/22/2016 .....	Vol. LXV - 8023
Sheriff's Certificate of Sale (Idaho Club – Parcel 96) – filed 12/22/2016 .....	Vol. LXV - 8027
Sheriff's Certificate of Sale (Idaho Club – Parcel 97) – filed 12/22/2016 .....	Vol. LXV - 8030

Sheriff's Certificate of Sale (Idaho Club – Parcel 98) – filed 12/22/2016 .....	Vol. LXV - 8033
Sheriff's Certificate of Sale (Idaho Club – Parcel 99) – filed 12/22/2016 .....	Vol. LXV - 8036
Sheriff's Certificate of Sale (Idaho Club – Parcel 100) – filed 12/22/2016 .....	Vol. LXV - 8039
Sheriff's Certificate of Sale (Idaho Club – Parcel 101) – filed 12/22/2016 .....	Vol. LXV - 8042
Sheriff's Certificate of Sale (Idaho Club – Parcel 102) – filed 12/22/2016 .....	Vol. LXV - 8045
Sheriff's Certificate of Sale (Idaho Club – Parcel 103) – filed 12/22/2016 .....	Vol. LXV - 8048
Sheriff's Certificate of Sale (Idaho Club – Parcel 104) – filed 12/22/2016 .....	Vol. LXV - 8051
Sheriff's Certificate of Sale (Idaho Club – Parcel 105) – filed 12/22/2016 .....	Vol. LXV - 8054
Sheriff's Certificate of Sale (Idaho Club – Parcel 106) – filed 12/22/2016 .....	Vol. LXV - 8057
Sheriff's Certificate of Sale (Idaho Club – Parcel 107) – filed 12/22/2016 .....	Vol. LXV - 8060
Sheriff's Certificate of Sale (Idaho Club – Parcel 108) – filed 12/22/2016 .....	Vol. LXV - 8063
Sheriff's Certificate of Sale (Idaho Club – Parcel 109) – filed 12/22/2016 .....	Vol. LXV - 8066
Sheriff's Certificate of Sale (Idaho Club – Parcel 110) – filed 12/22/2016 .....	Vol. LXV - 8069
Sheriff's Certificate of Sale (Idaho Club – Parcel 111) – filed 12/22/2016 .....	Vol. LXV - 8072
Sheriff's Certificate of Sale (Idaho Club – Parcel 112) – filed 12/22/2016 .....	Vol. LXV - 8075
Sheriff's Certificate of Sale (Idaho Club – Parcel 113) – filed 12/22/2016 .....	Vol. LXV - 8078
Sheriff's Certificate of Sale (Idaho Club – Parcel 114) – filed 12/22/2016 .....	Vol. LXV - 8081
Sheriff's Certificate of Sale (Idaho Club – Parcel 115) – filed 12/22/2016 .....	Vol. LXV - 8084
Sheriff's Certificate of Sale (Idaho Club – Parcel 116) – filed 12/22/2016 .....	Vol. LXV - 8087
Sheriff's Certificate of Sale (Idaho Club – Parcel 117) – filed 12/22/2016 .....	Vol. LXV - 8090
Sheriff's Certificate of Sale (Idaho Club – Parcel 118) – filed 12/22/2016 .....	Vol. LXV - 8093
Sheriff's Certificate of Sale (Idaho Club – Parcel 119) – filed 12/22/2016 .....	Vol. LXV - 8097
Sheriff's Certificate of Sale (Idaho Club – Parcel 120) – filed 12/22/2016 .....	Vol. LXV - 8100
Sheriff's Certificate of Sale (Idaho Club – Parcel 122) – filed 12/22/2016 .....	Vol. LXV - 8103
Sheriff's Certificate of Sale (Idaho Club – Parcel 123) – filed 12/22/2016 .....	Vol. LXV - 8106
Sheriff's Certificate of Sale (Idaho Club – Parcel 124) – filed 12/22/2016 .....	Vol. LXV - 8109
Sheriff's Certificate of Sale (Idaho Club – Parcel 125) – filed 12/22/2016 .....	Vol. LXV - 8112
Sheriff's Certificate of Sale (Idaho Club – Parcel 126) – filed 12/22/2016 .....	Vol. LXV - 8115
Sheriff's Certificate of Sale (Idaho Club – Parcel 127) – filed 12/22/2016 .....	Vol. LXV - 8118

Sheriff's Certificate of Sale (Idaho Club – Parcel 128) – filed 12/22/2016 .....	Vol. LXV - 8121
Sheriff's Certificate of Sale (Idaho Club – Parcel 129) – filed 12/22/2016 .....	Vol. LXVI - 8124
Sheriff's Certificate of Sale (Idaho Club – Parcel 130) – filed 12/22/2016 .....	Vol. LXVI - 8127
Sheriff's Certificate of Sale (Idaho Club – Parcel 131) – filed 12/22/2016 .....	Vol. LXVI - 8130
Sheriff's Certificate of Sale (Idaho Club – Parcel 132) – filed 12/22/2016 .....	Vol. LXVI - 8133
Sheriff's Certificate of Sale (Idaho Club – Parcel 133) – filed 12/22/2016 .....	Vol. LXVI - 8136
Sheriff's Certificate of Sale (Idaho Club – Parcel 134) – filed 12/22/2016 .....	Vol. LXVI - 8139
Sheriff's Certificate of Sale (Idaho Club – Parcel 135) – filed 12/22/2016 .....	Vol. LXVI - 8142
Sheriff's Certificate of Sale (Idaho Club – Parcel 136) – filed 12/22/2016 .....	Vol. LXVI - 8145
Sheriff's Certificate of Sale (Idaho Club – Parcel 137) – filed 12/22/2016 .....	Vol. LXVI - 8148
Sheriff's Certificate of Sale (Idaho Club – Parcel 138) – filed 12/22/2016 .....	Vol. LXVI - 8151
Sheriff's Certificate of Sale (Idaho Club – Parcel 139) – filed 12/22/2016 .....	Vol. LXVI - 8154
Sheriff's Certificate of Sale (Idaho Club – Parcel 140) – filed 12/22/2016 .....	Vol. LXVI - 8157
Sheriff's Certificate of Sale (Idaho Club – Parcel 141) – filed 12/22/2016 .....	Vol. LXVI - 8160
Sheriff's Certificate of Sale (Idaho Club – Parcel 142) – filed 12/22/2016 .....	Vol. LXVI - 8163
Sheriff's Certificate of Sale (Idaho Club – Parcel 143) – filed 12/22/2016 .....	Vol. LXVI - 8166
Sheriff's Certificate of Sale (Idaho Club – Parcel 144) – filed 12/22/2016 .....	Vol. LXVI - 8169
Sheriff's Certificate of Sale (Idaho Club – Parcel 145) – filed 12/22/2016 .....	Vol. LXVI - 8172
Sheriff's Certificate of Sale (Idaho Club – Parcel 146) – filed 12/22/2016 .....	Vol. LXVI - 8175
Sheriff's Certificate of Sale (Idaho Club – Parcel 147) – filed 12/22/2016 .....	Vol. LXVI - 8178
Sheriff's Certificate of Sale (Idaho Club – Parcel 148) – filed 12/22/2016 .....	Vol. LXVI - 8181
Sheriff's Certificate of Sale (Idaho Club – Parcel 149) – filed 12/22/2016 .....	Vol. LXVI - 8184
Sheriff's Certificate of Sale (Idaho Club – Parcel 150) – filed 12/22/2016 .....	Vol. LXVI - 8187
Sheriff's Certificate of Sale (Idaho Club – Parcel 151) – filed 12/22/2016 .....	Vol. LXVI - 8190
Sheriff's Certificate of Sale (Idaho Club – Parcel 152) – filed 12/22/2016 .....	Vol. LXVI - 8193
Sheriff's Certificate of Sale (Idaho Club – Parcel 153) – filed 12/22/2016 .....	Vol. LXVI - 8196
Sheriff's Certificate of Sale (Idaho Club – Parcel 154) – filed 12/22/2016 .....	Vol. LXVI - 8199
Sheriff's Certificate of Sale (Idaho Club – Parcel 155) – filed 12/22/2016 .....	Vol. LXVI - 8202
Sheriff's Certificate of Sale (Idaho Club – Parcel 156) – filed 12/22/2016 .....	Vol. LXVI - 8205

Sheriff's Certificate of Sale (Idaho Club – Parcel 157) – filed 12/22/2016 .....	Vol. LXVI - 8208
Sheriff's Certificate of Sale (Idaho Club – Parcel 158) – filed 12/22/2016 .....	Vol. LXVI - 8211
Sheriff's Certificate of Sale (Idaho Club – Parcel 159) – filed 12/22/2016 .....	Vol. LXVI - 8214
Sheriff's Certificate of Sale (Idaho Club – Parcel 163) – filed 12/22/2016 .....	Vol. LXVI - 8219
Sheriff's Certificate of Sale (Idaho Club – Parcel 177) – filed 12/22/2016 .....	Vol. LXVI - 8223
Application and Declaration of Richard L. Stacey for Writ of Execution Against JV, LLC – filed 01/09/2017 .....	Vol. I - 8228
Writ of Execution Against JV, LLC – filed 01/09/2017 .....	Vol. LXVI - 8232
Amended Notice of Appeal by JV, LLC IAR 17 (m), Request for Additional Clerk's Transcripts, and Request for Additional Court Reporter's Transcript – filed 01/13/2017 .....	Vol. LXVI - 8235
Valiant Idaho, LLC's Amended Request for Additional Transcript and Record on Appeal – filed 01/30/2017 .....	Vol. LXVII - 8254
Writ of Execution Against JV, LLC for Boundary County – filed 01/30/2017 .....	Vol. LXVII - 8262
Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/08/2017 .....	Vol. LXVII - 8268
Memorandum in Support of Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/08/2017 .....	Vol. LXVII - 8271
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/08/2017 .....	Vol. LXVII - 8279
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – filed 02/08/2017 .....	Vol. LXVIII - 8385
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – filed 02/08/2017 .....	Vol. LXIX - 8507
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – filed 02/08/2017 .....	Vol. LXX - 8634
JV, LLC's Motion and Application for Stay of Execution Upon Posting a Cash Deposit by JV, LLC [IAR 13 (b) 15] – filed 02/14/2017 .....	Vol. LXX - 8709
Errata to JV, LLC's Motion and Application for Stay of Execution Upon Posting a Cash Deposit by JV, LLC [IAR 13 (b) 15] – filed 02/15/2017 .....	Vol. LXX - 8737
Valiant Idaho, LLC's Notice of Non-Objection to JV, LLC's Motion and Application for Stay of Execution Upon Posting a Cash Deposit, and Errata Thereto – filed 02/16/2017 .....	Vol. LXX - 8743
VP, Inc.'s Memorandum in Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment – filed 02/17/2017	Vol. LXX - 8746
Declaration of Richard Villelli in Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment – filed 02/17/2017	Vol. LXX - 8756

Declaration of Richard Villelli in Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment (Continued) – filed 02/17/2017 ..... Vol. LXXI - 8770

Declaration of Daniel Keyes in Support of Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment – filed 02/17/2017 ..... Vol. LXXI - 8801

Order re: JV, LLC's Motion and Application for Stay of Execution Upon Posting a Cash Deposit – filed 02/21/2017 Vol. LXXI - 8822

Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/22/2017 ..... Vol. LXXI - 8827

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – Faxed copy filed 02/22/2017..... Vol. LXXI - 8841

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – Original filed 02/23/2017..... Vol. LXXI - 8845

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – Original filed 02/23/2017..... Vol. LXXII - 8908

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – Original filed 02/23/2017..... Vol. LXXIII - 9044

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – Original filed 02/23/2017..... Vol. LXXIV - 9180

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – Original filed 02/23/2017..... Vol. LXXV - 9318

Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/23/2017 ..... Vol. LXXV - 9328

Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/06/2017 Vol. LXXV - 9341

Writ of Assistance – filed 03/06/2017 ..... Vol. LXXV - 9361

Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/07/2017 ..... Vol. LXXV - 9386

Memorandum in Support of Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/07/2017 Vol. LXXV - 9388

Declaration of Richard Villelli in Support of Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/07/2017 . Vol. LXXV - 9394

Valiant Idaho, LLC's Motion to Clarify Court's Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/20/2017 ..... Vol. LXXV - 9399

Memorandum in Support of Valiant Idaho, LLC's Motion to Clarify Court's Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/20/2017 ..... Vol. LXXV - 9402

Notice of Hearing on Valiant Idaho, LLC's Motion to Clarify Court's Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/20/2017 .....	Vol. LXXV - 9409
Order Requesting Response Brief from Valiant Idaho, LLC – filed 03/27/2017 .....	Vol. LXXV - 9413
Valiant Idaho, LLC's Notice of Hearing on VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, etc. – filed 03/28/2017 .....	Vol. LXXV - 9415
Valiant Idaho, LLC's Application for an Extension to Respond to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 03/28/2017 .....	Vol. LXXV - 9418
Order on Valiant Idaho, LLC's Application for an Extension to Respond to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2 – filed 03/28/2017 .....	Vol. LXXV - 9421
VP, Inc.'s Memorandum in Opposition to Valiant Idaho, LLC's Motion to Clarify Court's Memorandum Decision and Order and Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/29/2017 .....	Vol. LXXV - 9424
Valiant Idaho, LLC's Memorandum in Reply to VP, Incorporated's Opposition to Motion to Clarify Court's Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 04/03/2017 .....	Vol. LXXV - 9436
Sheriff's Certificate on Return of Service, Writ of Execution – filed 04/06/2017 .....	Vol. LXXV - 9446
Writ of Execution Against JV, LLC – filed 04/06/2017 .....	Vol. LXXVI - 9448
Notice to Counsel – filed 04/06/2017 .....	Vol. LXXVI - 9453
Declaration of William Haberman in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 04/11/2017 .....	Vol. LXXVI - 9455
Declaration of William Haberman in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 04/11/2017 .....	Vol. LXXVII - 9573
Declaration of Steven B. Cordes, P.E., in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 04/11/2017 .....	Vol. LXXVII - 9593
Writ of Assistance – filed 04/11/2017 .....	Vol. LXXVII - 9635
Declaration of Jason Davis, Bonner County Deputy Sheriff – filed 04/11/2017 .....	Vol. LXXVII - 9662
Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 04/12/2017 .....	Vol. LXXVII - 9665
Valiant Idaho, LLC's Motion for a Temporary Restraining Order and Preliminary Injunction Against VP, Incorporated – filed 04/13/2017 .....	Vol. LXXVII - 9683
Valiant Idaho, LLC's Memorandum in Support of Motion for a Temporary Restraining Order and Preliminary Injunction Against VP, Incorporated – filed 04/13/2017 .....	Vol. LXXVII - 9686
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for a Temporary Restraining Order and Preliminary Injunction Against VP, Incorporated – filed 04/13/2017 .....	Vol. LXXVII - 9696

Declaration of William Haberman in Support of Valiant Idaho, LLC's Motion for a Temporary Restraining Order and Preliminary Injunction Against VP, Incorporated – filed 04/13/2017 .....	Vol. LXXVII - 9703
Order on Valiant Idaho, LLC's Motion for a Temporary Restraining Order Against VP, Incorporated – filed 04/13/2017 Vol. LXXVII - 9707	
Valiant Idaho, LLC's Notice of Depost – filed 04/13/2017.....	Vol. LXXVIII - 9711
Motion to Dissolve Temporary Restraining Order – filed 04/13/2017.....	Vol. LXXVIII - 9714
Memorandum in Support of Motion to Dissolve Temporary Restraining Order – filed 04/14/2017. Vol. LXXVIII - 9716	
Motion to Enlarge Time to Respond to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/17/2017.....	Vol. LXXVIII - 9733
Declaration of Chad M. Nicholson in Support of Valiant Idaho, LLC's Motion to Enlarge Time to Respond to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/17/2017.....	Vol. LXXVIII - 9736
Order Granting Motion to Enlarge Time to Respond to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/17/2017.....	Vol. LXXVIII - 9742
Reply Memorandum in Support of Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 04/17/2017 Vol. LXXVIII - 9745	
Declaration of Richard Vilelli in Support of Reply Memorandum in Support of Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 04/18/2017 .....	Vol. LXXVIII - 9758
Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/18/2017.....	Vol. LXXVIII - 9790
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/18/2017.....	Vol. LXXVIII - 9802
Declaration of William Haberman in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/18/2017.....	Vol. LXXVIII - 9815
Order Extending the Temporary Restraining Order Against VP, Incorporated – filed 04/20/2017... Vol. LXXVIII - 9819	
Corrected Certificate of Mailing – filed 04/21/2017.....	Vol. LXXVIII - 9823
Certificate of Mailing – filed 04/21/2017 .....	Vol. LXXVIII - 9824
Objection to Lodged Record and Objection to Certificate of Mailing of Clerk's Record – filed 04/25/2017 Vol. LXXVIII - 9825	
Notice of Hearing on North Idaho Resorts, LLC and VP, Inc.'s Objection to Lodged Record and Objection to Certificate of Mailing of Clerk's Record – filed 04/26/2017.....	Vol. LXXVIII - 9836
Notice of Filing Proposed Order – filed 04/26/2017 .....	Vol. LXXVIII - 9838
Objection to Lodged Record and Objection to Certificate of Mailing of Clerk's Record – filed 04/26/2017 Vol. LXXIX - 9844	
Order on Valiant Idaho, LLC's Motion for an Injunction Against VP, Incorporated – filed 04/26/2017 Vol. LXXIX - 9853	
Memorandum Decision re: Valiant Idaho, LLC's Motion to Clarify – filed 04/27/2017.....	Vol. LXXIX - 9861



Order Granting Injunction – filed 04/28/2017 ..... Vol. LXXIX - 9871

Order Granting Appellants VP, Incorporated’s and North Idaho Resorts, LLC’s Objections to Lodged Record and Objections to Certificate of Mailing – filed 05/01/2017 ..... Vol. LXXIX - 9879

Valiant Idaho, LLC’s Notice of Objection to the Consolidated Clerk’s Record on Appeal – filed 05/02/2017 Vol. LXXIX - 9883

Order Granting Respondent Valiant Idaho, LLC’s Objection to the Consolidated Clerk’s Record on Appeal – filed 05/03/2017 ..... Vol. LXXIX - 9900

Order Partially Vacating the Court’s May 1, 2017 Order Granting NIR’s and VP’s Objection to Lodged Record – filed 05/03/2017 ..... Vol. LXXIX - 9904

JV, LLC’s Objection to Clerk’s Record and motion to Correct and Make Additions to Clerk’s Record – filed 05/04/2017 Vol. LXXIX - 9907

Order Granting Appellant JV, LLC’s Objection to Clerk’s Record and Motion to Make Additions to Clerk’s Record – filed 05/05/2017 ..... Vol. LXXIX - 9928

Amended Notice of Appeal – filed 05/25/2017 ..... Vol. LXXIX - 9931

Clerk’s Certificate of Record – dated XX/XX/2017 ..... Vol. LXXIX - 9947

Clerk’s Certificate of Exhibits – dated 04/28/2017 ..... Vol. LXXIX - 9948

Clerk’s Certificate of Service – dated 04/28/2017 ..... Vol. LXXIX - 9955

**INDEX**

Acceptance of Service by VP, Incorporated of Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure – filed 10/03/2014 ..... Vol. VII - 908

ACI Northwest, Inc.'s Responsive Pleading to Valiant Idaho, LLC's Counterclaim, Cross-Claim, and Third-Party Complaint for Judicial Foreclosure – filed 09/29/2014 ..... Vol. VII - 904

Acknowledgment of Service of Summons and Complaint (North Idaho Resorts, LLC) – filed 04/07/2010 Vol. II - 199

Acknowledgment of Service of Summons and Complaint (VP Inc.) – filed 04/07/2010 ..... Vol. I - 197

Administrative Order – filed 09/27/2011 ..... Vol. II - 267

Affidavit of Charles Reeves in Support of R.E. Loans, LLC's Motions for Summary Judgment – filed 04/29/2014 Vol. V - 551

Affidavit of Charles W. Reeves – filed 01/20/2015 ..... Vol. XVII - 1912

Affidavit of Charles W. Reeves (Continued) – filed 01/20/2015 ..... Vol. XVIII - 2039

Affidavit of Farley Dakan in Support of R.E. Loans, LLC's Motions for Summary Judgment – filed 04/29/2014. Vol. IV - 532

Affidavit of James Berry on Behalf of JV, LLC – filed 08/26/2015 ..... Vol. XXIX - 3401

Affidavit of James Berry on Behalf of JV, LLC in Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment – filed 10/13/2015 ..... Vol. XXXII - 3778

Affidavit of Non-Military Service in Support of Motion for Entry of Default of Amy Korengut – filed 12/08/2014 .. Vol. XI - 1409

Affidavit of Richard L. Stacey in Support of R.E. Loans, LLC's Motion to Lift Automatic Stay – filed 06/26/2013 .. Vol. III - 343

Affidavit of Richard L. Stacey in Support of R.E. Loans, LLC's Motion for Entry of Default (Genesis Golf Builders) – filed 08/12/2013 ..... Vol. III - 365

Affidavit of Service – filed 03/11/2011 ..... Vol. II - 244

Affidavit of Service – filed 10/20/2014 ..... Vol. VIII - 965

Affidavit of Service (First American Title) – filed 10/05/2015 ..... Vol. XXXI - 3729

Affidavit of Service (Sandpoint Title Insurance) – filed 10/05/2015 ..... Vol. XXXI - 3727

Affidavit of Service (Second on First American Title) – filed 10/05/2015 ..... Vol. XXXI - 3731

Affidavit of Stanley J. Tharp in Support of Defendant Wells Fargo's Motion to Dismiss with Prejudice – filed 01/23/2012 ..... Vol. II - 302

Affidavit of Susan P. Weeks in Support of North Idaho Resorts, LLC's Motion for Entry of Default (Genesis Golf Builders) – filed 10/25/2013 ..... Vol. III - 412

Affidavit of Susan P. Weeks in Support of North Idaho Resorts, LLC and VP, Inc.'s Motion to Reconsider and Motion to Alter and Amend Judgment – filed 08/19/2015 .....	Vol. XXVII - 3133
Affidavit of Toby McLaughlin in Support of Third Party Defendant Panhandle Management Incorporated's Motion to Dismiss Claim Asserted by Third Party Plaintiff JV, LLC – filed 11/07/2014 .....	Vol. IX - 1015
Affidavit of Toby McLaughlin in Support of Third Party Defendant Idaho Club Homeowner's Association Inc.'s Motion to Dismiss Claim Asserted by Third Party Plaintiff JV, LLC – filed 11/07/2014 .....	Vol. IX - 1100
Amended Notice of Appeal – filed 05/25/2017 .....	Vol. LXXIX - 9931
Amended Notice of Appeal by JV, LLC IAR 17 (m), Request for Additional Clerk's Transcripts, and Request for Additional Court Reporter's Transcript – filed 01/13/2017 .....	Vol. LXVI - 8235
Amended Notice of Hearing on Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC and VP, Incorporated – filed 02/13/2015 .....	Vol. XXII - 2493
Amended Notice of Trial – filed 10/21/2015 .....	Vol. XXXIII - 3953
Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure – filed 09/15/2014 .....	Vol. VII - 844
Answer, Counterclaims, Cross-claims and Third Party Complaint of Defendant ACI Northwest, Inc. – filed 08/09/2010 .....	Vol. II - 204
Application and Declaration of Richard L. Stacey for Writ of Execution – filed 10/05/2016 .....	Vol. LIV - 6608
Application and Declaration of Richard L. Stacey for Writ of Execution Against North Idaho Resorts, LLC – filed 10/06/2016 .....	Vol. LVI - 6804
Application and Declaration of Richard L. Stacey for Writ of Execution Against JV, LLC – filed 10/06/2016 .....	Vol. LVI - 6812
Application and Declaration of Richard L. Stacey for Writ of Execution Against VP, Incorporated – filed 10/06/2016 .....	Vol. LVI - 6820
Application and Declaration of Richard L. Stacey for Writ of Execution Against JV, LLC for Boundary County – filed 10/13/2016 .....	Vol. LIX - 7253
Application and Declaration of Richard L. Stacey for Writ of Execution Against North Idaho Resorts, LLC for Boundary County – filed 10/13/2016 .....	Vol. LIX - 7258
Application and Declaration of Richard L. Stacey for Writ of Execution Against VP, Incorporated for Boundary County – filed 10/13/2016 .....	Vol. LIX - 7263
Application and Declaration of Richard L. Stacey for Writ of Execution Against JV, LLC – filed 01/09/2017 .....	Vol. I - 8228
Assignment of District Court Cases – filed 11/15/2011 .....	Vol. II - 295
Cash Bond posted by JV, LLC \$21,154.60 – posted 11/02/2016 .....	Vol. LIX - 7309
Certificate of Mailing – filed 04/21/2017 .....	Vol. LXXVIII - 9824
Clerk's Certificate of Exhibits – dated 04/28/2017 .....	Vol. LXXIX - 9948
Clerk's Certificate of Record – dated XX/XX/2017 .....	Vol. LXXIX - 9947

Clerk's Certificate of Service – dated 04/28/2017.....	Vol. LXXIX - 9955
Clerk's Entry of Default (Genesis Golf Builders) – filed 08/15/2013 .....	Vol. III - 389
Clerk's Entry of Default (Genesis Golf Builders) – filed 11/01/2013 .....	Vol. III - 433
Clerk's Entry of Default (Genesis Golf Builders, Inc.) – filed 08/29/2013 .....	Vol. III - 397
Clerk's Entry of Default Against Amy Korengut – filed 12/10/2014.....	Vol. XII - 1498
Clerk's Entry of Default Against Bar K, Inc. – filed 02/03/2015 .....	Vol. XXI - 2356
Clerk's Entry of Default Against C.E. Kramer Crane & Contracting, Inc. – filed 12/10/2014 .....	Vol. XII - 1518
Clerk's Entry of Default Against Cross-defendant T-O Engineers, Inc. – filed 09/26/2014 .....	Vol. VII - 900
Clerk's Entry of Default Against Genesis Golf Builders, Inc. – filed 12/10/2014 .....	Vol. XII - 1511
Clerk's Entry of Default Against Independent Mortgage Ltd. Co. – filed 01/06/2015 .....	Vol. XIII - 1636
Clerk's Entry of Default Against Montaheno Investments, LLC – filed 12/10/2014 .....	Vol. XII - 1504
Clerk's Entry of Default Against Netta Source, LLC – filed 12/10/2014 .....	Vol. XII - 1530
Clerk's Entry of Default Against Russ Capital Group, LLC – filed 12/10/2014.....	Vol. XII - 1524
Clerk's Entry of Default Against Third Party Defendant Pend Oreille Bonner Development Holdings, Inc. – filed 10/22/2014.....	Vol. VIII - 973
Clerk's Entry of Default Against Third Party Defendants Frederick J. Grant and Christine Grant – filed 05/29/2015	Vol. XXIV - 2777
Clerk's Entry of Default Against Timberline Investments, LLC – filed 01/06/2015 .....	Vol. XIII - 1642
Clerk's Record on Appeal.....	Vol. I - 2
Complaint – filed 10/13/2009.....	Vol. I - 172
Complaint for Judicial Foreclosure – filed 11/19/2014 .....	Vol. X - 1242
Corrected Certificate of Mailing – filed 04/21/2017.....	Vol. LXXVIII - 9823
Cross-defendant, VP, Incorporated's Request for Extension of Time to Answer or Otherwise Plead to Valiant, LLC's Amended Answer to Allege a Counter-Claim and Cross-Claim and to Serve Third Party – filed 12/01/2014.....	Vol. XI - 1377
Declaration of Barney Ng in Support of Valiant Idaho, LLC's Reply to North Idaho Resorts, LLC's and VP, Incorporated's Opposition to Valiant, Idaho, LLC's Third Motion for Summary Judgment – filed 10/20/2015 .....	Vol. XXXIII - 3906
Declaration of Barney Ng in Support of Valiant Idaho, LLC's Third Motion for Summary Judgment – filed 09/25/2015 .....	Vol. XXXI - 3658
Declaration of C. Dean Shafer in Support of Valiant Idaho, LLC's Motion for Entry of Final Judgment – filed 05/20/2015 .....	Vol. XXIII - 2627

Declaration of C. Dean Shafer in Support of Valiant Idaho, LLC's Motion for an Order of Sale of Real Property – filed 07/22/2015 .....	Vol. XXV - 2926
Declaration of C. Dean Shafer in Support of Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3301
Declaration of Chad M. Nicholson dated October 16, 2015 – filed 10/16/2015.....	Vol. XXXII - 3870
Declaration of Chad M. Nicholson dated October 20, 2015 – filed 10/20/2015.....	Vol. XXXIII - 3914
Declaration of Chad M. Nicholson in Support of R.E. Loans, LLC's Motion for Summary Judgment Against Cross-claimant ACI Northwest, Inc. – filed 04/29/2014.....	Vol. IV - 451
Declaration of Chad M. Nicholson in Support of Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3276
Declaration of Chad M. Nicholson in Support of Valiant Idaho, LLC's Reply Memoranda re: Motions <i>In Limine</i> – filed 12/28/2015 .....	Vol. XXXV - 4258
Declaration of Chad M. Nicholson in Support of Valiant Idaho, LLC's Motion to Enlarge Time to Respond to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/17/2017 .....	Vol. LXXVIII - 9736
Declaration of Charles W. Reeves in Support of Valiant Idaho, LLC's Motion for an Order of Sale of Real Property – filed 07/22/2015 .....	Vol. XXV - 2959
Declaration of Charles W. Reeves in Support of Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3280
Declaration of Daniel Keyes in Support of Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment – filed 02/17/2017 .....	Vol. LXXI - 8801
Declaration of Daniel M. Keyes in Support of VP and NIR's Opposition to Valiant Idaho's Motion for Sanctions – filed 08/24/2016 .....	Vol. XLVIII - 5868
Declaration of Jason Davis, Bonner County Deputy Sheriff – filed 04/11/2017.....	Vol. LXXVII - 9662
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Cross-defendant T-O Engineers, Inc. – filed 09/26/2014 .....	Vol. VII - 884
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Pend Oreille Bonner Development Holdings, Inc. – filed 10/03/2014.....	Vol. VIII - 918
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 01/20/2015 .....	Vol. XV - 1747
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated (Continued) – filed 01/20/2015.....	Vol. XVI - 1884
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Bar K, Inc. – filed 02/02/2015.....	Vol. XXI - 2342
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Entry of Final Judgment – filed 05/20/2015 .....	Vol. XXIII - 2612
Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendants Frederick J. Grant and Christine Grant – filed 05/22/2015.....	Vol. I - 2751

Declaration of Jeff R. Sykes in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Inc.'s Motion for a New Trial – filed 08/10/2016..... Vol. XLVII - 5714

Declaration of Pamela Lemieux in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendants Frederick J. Grant and Christine Grant – filed 05/22/2015..... Vol. XXIV - 2763

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – Faxed copy filed 02/22/2017..... Vol. LXXI - 8841

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – Original filed 02/23/2017..... Vol. LXXI - 8845

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – Original filed 02/23/2017..... Vol. LXXII - 8908

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – Original filed 02/23/2017..... Vol. LXXIII - 9044

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – Original filed 02/23/2017..... Vol. LXXIV - 9180

Declaration of Richard L. Stacey in Support of Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – Original filed 02/23/2017..... Vol. LXXV - 9318

Declaration of Richard L. Stacey in Support of Motion to Substitute Valiant, Idaho LLC in Place of R.E. Loans, LLC as the Real Party in Interest – filed 07/21/2014 ..... Vol. V - 674

Declaration of Richard L. Stacey in Support of Motion to Substitute Valiant Idaho, LLC in Place of Wells Fargo Capital Finance, LLC as the Real Party in Interest – filed 08/18/2014 ..... Vol. VI - 674

Declaration of Richard L. Stacey in Support of Motion to Substitute Valiant Idaho, LLC in Place of Mortgage Fund '08 LLC as the Real Party in Interest – filed 10/06/2014 ..... Vol. VIII - 933

Declaration of Richard L. Stacey in Support of Motion to Substitute Valiant Idaho, LLC in Place of Pensco Trust Co. as the Real Party in Interest – filed 10/06/2014 ..... Vol. VIII - 946

Declaration of Richard L. Stacey in Support of R.E. Loans, LLC's Motion for Summary Judgment Against Cross-claimant R.C. Worst & Company, Inc. – filed 04/29/2014 ..... Vol. IV - 498

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Counter-Defendant Genesis Golf Builders, Inc. – filed 12/08/2014..... Vol. XI - 1387

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Amy Korengut – filed 12/08/2014 ..... Vol. XI - 1399

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Independent Mortgage Ltd. Co. – filed 12/08/2014 ..... Vol. XII - 1419

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant C.E. Kramer Crane & Contracting, Inc. – filed 12/08/2014..... Vol. XII - 1434

Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Netta Source, LLC – filed 12/08/2014 .....	Vol. XII - 1449
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Montaheno Investments, LLC – filed 12/08/2014 .....	Vol. XII - 1464
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Russ Capital Group, LLC – filed 12/08/2014 .....	Vol. XII - 1479
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Timberline Investments, LLC – filed 12/22/2014 .....	Vol. XIII - 1601
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motions <i>In Limine</i> – filed 12/15/2015	Vol. XXXV - 4057
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Memorandum of Costs and Attorney's Fees – filed 07/06/2016 .....	Vol. XLII - 5058
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Memorandum of Costs and Attorney's Fees – filed 07/06/2016 .....	Vol. XLIII - 5190
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/21/2016 .....	Vol. LIV - 6573
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Memorandum of Costs and Attorneys' Fees Against JV, LLC – filed 11/25/2016 .....	Vol. LX - 7442
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/08/2017 .....	Vol. LXVII - 8279
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – filed 02/08/2017 .....	Vol. LXVIII - 8385
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – filed 02/08/2017 .....	Vol. LXIX - 8507
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) (Continued) – filed 02/08/2017 .....	Vol. LXX - 8634
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for a Temporary Restraining Order and Preliminary Injunction Against VP, Incorporated – filed 04/13/2017 .....	Vol. LXXVII - 9696
Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/18/2017 .....	Vol. LXXVIII - 9802
Declaration of Richard Stacey in Support of Valiant Idaho, LLC's Memorandum Responses to VP, Inc.'s and JV, LLC's Objections and Motions to Disallow Memorandum of Costs and Attorney's Fees – filed 08/10/2016 ..	Vol. XLVI - 5591
Declaration of Richard Stacey in Support of Valiant Idaho, LLC's Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 08/10/2016 .....	Vol. XLVII - 5685
Declaration of Richard Villelli in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC and VP, Incorporated – filed 02/04/2015 .....	Vol. XXI - 2392
Declaration of Richard Villelli in Opposition to Valiant Idaho, LLC's Motion for Order of Sale – filed 08/04/2015..	Vol. XXVI - 2987

Declaration of Richard Vilelli in Opposition to Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale – filed 08/26/2015 .....	Vol. XXIX - 3424
Declaration of Richard Vilelli in Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 10/14/2015 .....	Vol. XXXII - 3828
Declaration of Richard Vilelli in Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment – filed 02/17/2017 ..	Vol. LXX - 8756
Declaration of Richard Vilelli in Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment (Continued) – filed 02/17/2017 .....	Vol. LXXI - 8770
Declaration of Richard Vilelli in Support of Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/07/2017 .....	Vol. LXXV - 9394
Declaration of Richard Vilelli in Support of Reply Memorandum in Support of Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 04/18/2017.....	Vol. LXXVIII - 9758
Declaration of Sally Mitchell in Support of Supplemental Memorandum Supporting Valiant Idaho, LLC's Motion Contesting JV, LLC's Third Party Claim; and Opposition to JV, LLC's Motion for Stay of Execution – filed 11/04/2016 .....	Vol. LX - 7392
Declaration of Steven B. Cordes, P.E., in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 04/11/2017 .....	Vol. LXXVII - 9593
Declaration of Susan P. Weeks in Opposition to Valiant's Third Motion for Summary Judgment – filed 10/13/2015 Vol. XXXII - 3791	
Declaration of Weeks in Support of VP, Inc.'s Motion for New Trial – filed 08/03/2016.....	Vol. XLVI - 5550
Declaration of William Haberman in Support of Valiant Idaho, LLC's Closing Argument – filed 03/14/2016 .....	Vol. XXXVII - 4471
Declaration of William Haberman in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 04/11/2017 .....	Vol. LXXVI - 9455
Declaration of William Haberman in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 04/11/2017 .....	Vol. LXXVII - 9573
Declaration of William Haberman in Support of Valiant Idaho, LLC's Motion for a Temporary Restraining Order and Preliminary Injunction Against VP, Incorporated – filed 04/13/2017 .....	Vol. LXXVII - 9703
Declaration of William Haberman in Support of Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/18/2017.....	Vol. LXXVIII - 9815
Decree of Foreclosure – filed 06/22/2016 .....	Vol. XL - 4910
Decree of Foreclosure – filed 07/20/2016.....	Vol. XLIV - 5317
Decree of Foreclosure – filed 08/05/2015 .....	Vol. XXVI - 3075
Decree of Foreclosure (Continued) – filed 06/22/2016 .....	Vol. XLI - 4940



Decree of Foreclosure (Continued) – filed 07/20/2016 .....	Vol. XLV - 5413
Default Judgment (Genesis Golf Builders) – filed 08/15/2013.....	Vol. III - 383
Default Judgment (Genesis Golf Builders) – filed 08/29/2013 .....	Vol. III - 402
Default Judgment (Genesis Golf Builders) – filed 11/01/2013 .....	Vol. III - 428
Defendant North Idaho Resorts, LLC’s Motion to Substitute Valiant Idaho, LLC in Place of Wells Fargo Capital Finance, LLC as the Real Party in Interest – filed 09/04/2014 .....	Vol. VI - 771
Defendant VP, Inc.’s and NIR, LLC’s Memorandum in Opposition to Valiant Idaho, LLC’s Motion for Sanctions – filed 08/24/2016 .....	Vol. XLVIII - 5886
Defendant VP, Incorporated’s Request for Extension of Time to Respond to Valiant Idaho, LLC’s Motion for Leave to Amend Answer to Allege a Counterclaim and Cross-claim, and to Serve Third Party – filed 11/12/2014....	Vol. X - 1153
Defendants North Idaho Resorts and VP, Incorporated’s Motion for Judicial Notice of Barney Ng – filed 10/13/2015 .....	Vol. XXXII - 3823
Defendants North Idaho Resorts, LLC and VP Incorporated’s Memorandum in Opposition to Valiant Idaho, LLC’s Motion for Summary Judgment – filed 02/04/2015.....	Vol. XXI - 2359
Defendants North Idaho Resorts, LLC and VP Incorporated’s Memorandum in Opposition to Valiant Idaho, LLC’s Third Motion for Summary Judgment – filed 10/13/2015.....	Vol. XXXII - 3810
Defendants North Idaho Resorts, LLC and VP Incorporated’s Second Motion for Enlargement of Time to File Memorandum in Support of Motion for Reconsideration and Clarification – filed 05/26/2015 .....	Vol. XXIV - 2771
Defendants North Idaho Resorts, LLC and VP, Incorporated’s Memorandum in Opposition to Valiant Idaho, LLC’s Motion to Strike Inadmissible Evidence – filed 10/16/2015 .....	Vol. XXXII - 3879
Defendants North Idaho Resorts, LLC and VP, Incorporated’s Memorandum in Opposition to Valiant Idaho, LLC’s Second Motion to Strike Inadmissible Evidence – filed 10/22/2015.....	Vol. XXXIII - 3990
Defendants North Idaho Resorts, LLC and VP, Incorporated’s Memorandum in Support of Motion to Strike the Declarations of Barney Ng and Chad M. Nicholson – filed 10/22/2015 .....	Vol. XXXIII - 3997
Defendants North Idaho Resorts, LLC and VP, Incorporated’s Motion for Enlargement of Time to File Answers and Responses to Discovery Requests Propounded by Valiant Idaho, LLC – filed 03/02/2015 .....	Vol. XXII - 2516
Defendants North Idaho Resorts, LLC and VP, Incorporated’s Motion for Enlargement of Time to File Memorandum in Support of Motion for Reconsideration and Clarification – filed 05/11/2015 .....	Vol. XXII - 2598
Defendants North Idaho Resorts, LLC and VP, Incorporated’s Motion for Enlargement of Time to File Reply to Plaintiff’s Opposition to North Idaho Resorts, LLC and VP, Inc.’s Renewed Motion for Reconsideration and Clarification – filed 07/06/2015 .....	Vol. XXIV - 2799
Defendants North Idaho Resorts, LLC and VP, Incorporated’s Motion for Enlargement of Time to File Reply to Plaintiff’s Opposition to North Idaho Resorts, LLC and VP, Inc.’s Renewed Motion for Reconsideration and Clarification – filed 10/13/2015 .....	Vol. XXXI - 3746
Defendants North Idaho Resorts, LLC and VP, Incorporated’s Motion to Strike the Declarations of Barney Ng and Chad M. Nicholson – filed 10/22/2015.....	Vol. XXXIII - 3995
Errata to Declaration of Richard Vilelli in Opposition to Valiant Idaho, LLC’s Motion to Alter, Amend and/or Reconsider the Order of Sale – filed 08/27/2015 .....	Vol. XXIX - 3487

Errata to Declaration of Susan P. Weeks in Opposition to Valiant's Third Motion for Summary Judgment – filed 10/22/2015 .....	Vol. XXXIII - 3988
Errata to JV, LLC's Motion and Application for Stay of Execution Upon Posting a Cash Deposit by JV, LLC [IAR 13 (b) 15] – filed 02/15/2017 .....	Vol. LXX - 8737
Findings re: R.E. Loans, LLC's Motions for Summary Judgment Against ACI Northwest, Inc. – filed 07/21/2014 .	Vol. V - 647
Index .....	Vol. I - 34
Judgment – filed 06/22/2016 .....	Vol. XXXVII - 4619
Judgment – filed 07/21/2014 .....	Vol. V - 653
Judgment – filed 08/05/2015 .....	Vol. XXVI - 3082
Judgment (ACI Northwest, Inc.) – filed 02/18/2015 .....	Vol. XXII - 2502
Judgment (Continued) – filed 06/22/2016 .....	Vol. XL - 4806
Judgment (Continued) – filed 06/22/2016 .....	Vol. XXXIX - 4693
Judgment (Dismissal of JV, LLC's Third Party Complaint Against Idaho Club Homeowner's Association, Inc.) – filed 01/15/2015 .....	Vol. XIV - 1694
Judgment (Pucci Construction, Inc.) – filed 02/18/2015 .....	Vol. XXII - 2499
Judgment re: Costs and Attorneys' Fees – filed 08/22/2016 .....	Vol. XLVIII - 5844
Judgment re: Rule 11 Sanctions – filed 12/06/2016 .....	Vol. LX - 7462
JV, LLC's Amended Exhibit List and Documents – filed 12/22/2015 .....	Vol. XXXV - 4205
JV, LLC's Correction to its Response, Objection and Opposition to Plaintiff's Motion for Sanctions – filed 08/25/2016	Vol. XLVIII - 5920
JV, LLC's Defendants Trial Exhibit – filed 08/11/2015 .....	Vol. XXVI - 3088
JV, LLC's First Supplemental Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment – filed 02/27/2015 .....	Vol. XXII - 2505
JV, LLC's Fourth Amended Exhibit List and Documents – filed 03/11/2016 .....	Vol. XXXVII - 4418
JV, LLC's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment – filed 02/02/2015 .....	Vol. XIX - 2076
JV, LLC's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment (Continued) – filed 02/02/2015 .....	Vol. XX - 2210
JV, LLC's Motion and Application for Stay of Execution Upon Posting a Cash Deposit by JV, LLC [IAR 13 (b) 15] – filed 11/02/2016.....	Vol. LIX - 7311
JV, LLC's Motion and Application for Stay of Execution Upon Posting a Cash Deposit by JV, LLC [IAR 13 (b) 15] – filed 02/14/2017 .....	Vol. LXX - 8709

JV, LLC's Motion to Alter, Amend and Reconsider re: 1. Memorandum Decision and Order 2. Judgment 3. Decree of Foreclosure 4. Order of Sale, and JV, LLC's Memorandum in Support and Request for Hearing – filed 08/02/2016	Vol. XLV - 5521
JV, LLC's Motion to Alter, Amend and to Reconsider the Court's Memorandum Decision and Order Filed 04/14/2015 and Request for Oral Argument Time/Date for a Hearing; Not Yet to be Set – filed 04/28/2015	..... Vol. XXII - 2579
JV, LLC's Motion to Alter, Amend, and Reconsider the Court's Memorandum Decision and Order re: JV, LLC's Motions to Reconsider, and JV, LLC's Motion for Partial Summary Judgment for Affirmative Relief Concerning JV, LLC's Redemption Deed and as to Valiant's Redemption Deed; and Request for Hearing – filed 07/30/2015	Vol. XXV - 2967
JV, LLC's Motion to Reconsider, Alter, and Amend the Judgment [Rule 11 (b) and Rule 52 (b)]; and Request for Hearing – filed 08/18/2015	..... Vol. XXVI - 3095
JV, LLC's Motion to Strike the Declaration of William Haberman – filed 04/18/2016	..... Vol. XXXVII - 4476
JV, LLC's Motion to Vacate Valiant's Hearing Date of February 18, 2015 on its Motion for Summary Judgment, Request for Continuance and Request for Hearing on Short Notice – filed 02/02/2015	..... Vol. XX - 2331
JV, LLC's Objection and Memorandum in Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment and JV, LLC's Motion to Strike Valiant's Third Motion for Summary Judgment and Notice of Hearing for October 23, 2015 at 1:30 p.m. – filed 10/13/2015	..... Vol. XXXII - 3748
JV, LLC's Objection and Motion to Disallow Valiant's Memorandum of Fees and Costs – filed 07/18/2016	Vol. XLIV - 5306
JV, LLC's Objection to Clerk's Record and motion to Correct and Make Additions to Clerk's Record – filed 05/04/2017	..... Vol. LXXIX - 9907
JV, LLC's Objection to Entry of Final Judgment – as Drafted by Valiant; and Request for a Hearing – filed 07/07/2015	..... Vol. XXIV - 2847
JV, LLC's Objection to Valiant's Motion for Relief from Automatic Stay and Memorandum in Support – filed 09/26/2016	..... Vol. LIV - 6589
JV, LLC's Objection to Valiant's Motion <i>In Limine</i> – filed 12/23/2015	..... Vol. XXXV - 4233
JV, LLC's Post Trial Memorandum and Argument – filed 05/12/2016	..... Vol. XXXVII - 4489
JV, LLC's Proposed Judgment and Decree of Foreclosure and JV, LLC's Request for Additional Time of at Least 14 Days – filed 07/15/2016	..... Vol. XLIII - 5274
JV, LLC's Request for Clerk's Minutes and Reporter's Typed Transcript of Entire Proceeding Including the District Court's Remarks and Rulings in Open Court on September 2, 2015 – filed 09/08/2015	..... Vol. XXX - 3533
JV, LLC's Response to Valiant's Most Recent "Filings" and JV, LLC's Objection Thereto – filed 10/21/2015	..... Vol. XXXIII - 3972
JV, LLC's Response to Valiant's Motion to Strike Inadmissible Evidence – filed 10/19/2015	..... Vol. XXXIII - 3884
JV, LLC's Response, Objection and Opposition to Plaintiff's Motion for Sanctions – filed 08/24/2016	..... Vol. XLVIII - 5847
JV, LLC's Second Amended Exhibit List and Documents – filed 01/22/2016	..... Vol. XXXVI - 4363

JV, LLC's Special Appearance Contesting Jurisdiction; and JV, LLC's Answer to Complaint; and JV, LLC's Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure; and JV, LLC's Cross-claim; and JV, LLC's Third Party Complaint – filed 09/15/2014 .....	Vol. VII - 784
JV, LLC's Third Amended Exhibit List and Documents – filed 01/26/2016 .....	Vol. XXXVI - 4404
JV, LLC's Third Party Claim (Idaho Code 11-203) – filed 11/02/2016.....	Vol. LX - 7341
JV, LLC's Trial Memorandum – filed 01/22/2016 .....	Vol. XXXVI - 4316
JV's Affidavit of James W. Berry Opposing Valiant's Motion for Summary Judgment – filed 02/02/2015...Vol. XX - 2323	
JV's Objection, and Motion to Disallow Valiant's Memorandum of Attorney Costs and Fees – filed 12/02/2016 Vol. LX - 7447	
JV's Reply to Valiant's Memorandum in Opposition to JV's Motion filed on 07/21/2015, and Motions to Strike – filed 08/31/2015 .....	Vol. XXIX - 3499
JV's Supplemental Motion to Alter, Amend, Set Aside the Judgment, Based on Valiant's Motions to Change the Order of Sale and Change the Decree of Foreclosure Pursuant to Rules 11 (b); 52 (b) and Rule 60 and Notice of Hearing – filed 08/26/2015.....	Vol. XXIX - 3386
Memorandum Decision & Order Granting Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 04/14/2015.....	Vol. XXII - 2560
Memorandum Decision & Order re: Motions Heard on October 23, 2015 – filed 10/30/2015 .....	Vol. XXXIII - 4000
Memorandum Decision and Order Denying JV, LLC's and VP, Incorporated's Motions to Alter, Amend and Reconsider – filed 08/16/2016 .....	Vol. XLVII - 5793
Memorandum Decision and Order Denying JV, LLC's and VP, Incorporated's Motions to Alter, Amend and Reconsider (Continued) – filed 08/16/2016 .....	Vol. XLVIII - 5815
Memorandum Decision and Order Granting in Part Reconsideration of the July 21, 2015 Memorandum Decision & Order – filed 09/04/2015.....	Vol. XXX - 3527
Memorandum Decision and Order Granting Motion for Entry of Final Judgment – filed 06/23/2015 .....	Vol. XXIV - 2791
Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 10/07/2016.....	Vol. LIX - 7230
Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/06/2017 Vol. LXXV - 9341	
Memorandum Decision and Order re: 1) JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated's Motions to Reconsider 2) Valiant's Request for Entry of Proposed Final Judgment and Decree of Foreclosure and Sale – filed 07/21/2015 .....	Vol. XXIV - 2856
Memorandum Decision and Order re: Court Trial held on January 28 and 29, and March 16 and 17, 2016 – filed 05/27/2016.....	Vol. XXXVII - 4589
Memorandum Decision Order Awarding Costs and Attorney's Fees to Valiant Idaho, LLC – filed 08/22/2016 .....	Vol. XLVIII - 5829

Memorandum Decision Order Denying Valiant Idaho, LLC's Motion for Sanctions – filed 08/29/2016.....	Vol. XLVIII - 5925
Memorandum Decision Order Denying VP, Inc.'s Motion for New Trial – filed 08/25/2016.....	Vol. XLVIII - 5906
Memorandum Decision Order Granting Valiant Idaho, LLC's Motion for Sanctions – filed 11/14/2016 .	Vol. LX - 7402
Memorandum Decision re: Valiant Idaho, LLC's Motion to Clarify – filed 04/27/2017 .....	Vol. LXXIX - 9861
Memorandum in Opposition to Defendant JV, LLC's Motion to Vacate Valiant's Hearing on October 23, 2015 – filed 10/20/2015 .....	Vol. XXXIII - 3900
Memorandum in Opposition to JV, LLC's Motion to Alter, Amend and to Reconsider the Court's Memorandum Decision and Order Filed 04/14/2015 – filed 07/06/2015 .....	Vol. XXIV - 2820
Memorandum in Opposition to JV, LLC's Motion to Alter, Amend and to Reconsider filed 08/18/2015 – filed 08/25/2015 .....	Vol. XXVIII - 3367
Memorandum in Opposition to JV, LLC's Motion to Alter, Amend and to Reconsider the Court's Memorandum Decision and Order dated July 21, 2015 – filed 08/26/2015 .....	Vol. XXVIII - 3376
Memorandum in Opposition to North Idaho Resorts, LLC and VP, Inc.'s Renewed Motion for Reconsideration and Clarification – filed 07/06/2015.....	Vol. XXIV - 2804
Memorandum in Opposition to VP, Incorporated's Motion to Dismiss Third Party Complaint or, in the Alternative, Motion for Leave to Amend Answer to Allege a Counterclaim and Cross-claim, and to Serve Third Party Complaint – filed 11/05/2014 .....	Vol. VIII - 982
Memorandum in Reply to Defendant JV, LLC's Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment – filed 10/20/2015 .....	Vol. XXXIII - 3892
Memorandum in Reply to JV, LLC's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment – filed 03/11/2015 .....	Vol. XXII - 2519
Memorandum in Reply to North Idaho Resorts, Inc. and VP, Incorporated's Opposition to Valiant, Idaho, LLC's Third Motion for Summary Judgment – filed 10/20/2015.....	Vol. XXXIII - 3924
Memorandum in Reply to North Idaho Resorts, LLC and VP, Incorporated's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment – filed 03/11/2015 .....	Vol. XXII - 2547
Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/22/2017 .....	Vol. LXXI - 8827
Memorandum in Reply to VP, Inc.'s Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/23/2017 .....	Vol. LXXV - 9328
Memorandum in Reply to: (1) JV, LLC's Objection; and (2) VP, Inc. and North Idaho Resorts, LLC's Opposition to Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/29/2016 .....	Vol. LIV - 6603
Memorandum in Support of Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/07/2017 .....	Vol. LXXV - 9388
Memorandum in Support of Motion to Dissolve Temporary Restraining Order – filed 04/14/2017.	Vol. LXXVIII - 9716
Memorandum in Support of R.E. Loans, LLC's Motion to Lift Automatic Stay (Mortgage Fund '08 LLC) – filed 06/26/2013 .....	Vol. III - 339

Memorandum in Support of Renewed Motion for Reconsideration and Clarification – filed 06/16/2015.....	Vol. XXIV - 2783
Memorandum in Support of Valiant Idaho, LLC’s Motion Contesting JV, LLC’s Third Party Claim; and Opposition to JV, LLC’s Motion for Stay of Execution – filed 11/03/2016 .....	Vol. LX - 7364
Memorandum in Support of Valiant Idaho, LLC’s Motion for an Order of Sale of Real Property – filed 07/22/2015	Vol. XXV - 2912
Memorandum in Support of Valiant Idaho, LLC’s Motion for Entry of Final Judgment – filed 05/20/2015 ...	Vol. XXII - 2605
Memorandum in Support of Valiant Idaho, LLC’s Motion for Leave to Amend Third Party Complaint to Join an Additional Party – filed 11/24/2014 .....	Vol. XI - 1371
Memorandum in Support of Valiant Idaho, LLC’s Motion for Order of Sale of Real Property – filed 06/22/2016 .....	Vol. XLI - 4997
Memorandum in Support of Valiant Idaho, LLC’s Motion for Relief from Automatic Stay – filed 09/21/2016	Vol. LIV - 6566
Memorandum in Support of Valiant Idaho, LLC’s Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 01/20/2015 .....	Vol. XIV - 1725
Memorandum in Support of Valiant Idaho, LLC’s Motion <i>In Limine</i> re: North Idaho Resorts, LLC and VP, Inc. – filed 12/15/2015 .....	Vol. XXXIV - 4036
Memorandum in Support of Valiant Idaho, LLC’s Motion <i>In Limine</i> re: North Idaho Resorts, LLC and VP, Inc.(Continued) – filed 12/15/2015.....	Vol. XXXV - 4036
Memorandum in Support of Valiant Idaho, LLC’s Motion <i>In Limine</i> re: JV, LLC – filed 12/15/2015.....	Vol. XXXV - 4051
Memorandum in Support of Valiant Idaho, LLC’s Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3253
Memorandum in Support of Valiant Idaho, LLC’s Motion to Amend Decree of Foreclosure – filed 08/19/2015 .....	Vol. XXVII - 3244
Memorandum in Support of Valiant Idaho, LLC’s Motion to Clarify Court’s Memorandum Decision and Order Granting Valiant Idaho, LLC’s Motion to Enforce Judgment – filed 03/20/2017 .....	Vol. LXXV - 9402
Memorandum in Support of Valiant Idaho, LLC’s Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/08/2017 .....	Vol. LXVII - 8271
Memorandum in Support of Valiant Idaho, LLC’s Motion to Strike Inadmissible Evidence – filed 10/09/2015 .....	Vol. XXXI - 3737
Memorandum in Support of Valiant Idaho, LLC’s Second Motion to Strike Inadmissible Evidence – filed 10/20/2015 .....	Vol. XXXIII - 3945
Memorandum in Support of Valiant Idaho, LLC’s Third Motion for Summary Judgment – filed 09/25/2015	Vol. XXXI - 3627
Memorandum in Support of VP, Inc.’s Motion for New Trial – filed 08/03/2016.....	Vol. XLV - 5546

Memorandum in Support of VP, Inc.'s Motion to Alter, Amend, and Reconsider the Decree of Foreclosure and Judgment – filed 08/04/2016 .....	Vol. XLVI - 5555
Memorandum in Support of VP, Inc.'s Motion to Strike the Declaration of William Haberman – filed 04/21/2016 .	Vol. XXXVII - 4484
Motion for Enlargement of Time to File North Idaho Resorts, LLC and VP, Inc.'s Reply Memorandum in Support of Motion to Reconsider and Motion to Alter and Amend Judgment – filed 10/22/2015 .....	Vol. XXXIII - 3986
Motion for Leave to Amend Answer to Allege a Counterclaim and Cross-claim, and to Serve Third Party Complaint – filed 11/05/2014 .....	Vol. VIII - 977
Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/07/2017 .....	Vol. LXXV - 9386
Motion for Reconsideration and Clarification – filed 04/29/2015 .....	Vol. XXII - 2596
Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 08/10/2016 .....	Vol. XLVI - 5682
Motion to Dissolve Temporary Restraining Order – filed 04/13/2017 .....	Vol. LXXVIII - 9714
Motion to Enlarge Time to Respond to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/17/2017 .....	Vol. LXXVIII - 9733
Motion to Shorten Time to Have Heard Valiant Idaho, LLC's (1) Motion Contesting JV, LLC's Third Party Claim; and Opposition to JV, LLC's Motion for Stay of Execution; and (2) Motion for Sanctions under IC 12-123 and IRCP 11 – filed 11/03/2016 .....	Vol. LX - 7369
Motion to Shorten Time to Have Heard Valiant Idaho, LLC's Second Motion to Strike Inadmissible Evidence – filed 10/20/2015 .....	Vol. XXXIII - 3911
Motion to Strike Memoranda and Declarations/Affidavits in Opposition to Valiant Idaho, LLC's Third Motion for Summary Judgment or, in the Alternative, Motion for Extension of Time to File Reply Memoranda – filed 10/16/2015 .....	Vol. XXXII - 3864
Motion to Substitute Valiant Idaho, LLC in Place of Mortgage Fund '08 LLC as the Real Party in Interest – filed 10/06/2014.....	Vol. VIII - 928
Motion to Substitute Valiant Idaho, LLC in Place of Pensco Trust Co, as the Real Party in Interest – filed 10/06/2014 .....	Vol. VIII - 941
Motion to Substitute Valiant Idaho, LLC in Place of R.E. Loans, LLC as the Real Party in Interest – filed 07/21/2014 .....	Vol. V - 656
Motion to Substitute Valiant Idaho, LLC in Place of Wells Fargo Capital Finance, LLC as the Real Party in Interest – filed 08/18/2014.....	Vol. V - 670
North Idaho Resorts, LLC and VP, Inc.'s Memorandum in Opposition to Valiant Idaho's Motion to Amend Degree of Foreclosure and Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/26/2015 .	Vol. XXIX - 3413
North Idaho Resorts, LLC and VP, Inc.'s Memorandum in Support of Motion to Reconsider and Motion to Alter and Amend Judgment – filed 08/19/2015.....	Vol. XXVII - 3116
North Idaho Resorts, LLC and VP, Inc.'s Motion to Reconsider and Motion to Alter and Amend Judgment – filed 08/19/2015 .....	Vol. XXVII - 3114

North Idaho Resorts, LLC and VP, Inc.'s Reply Memorandum in Support of Motion to Reconsider and Motion to Alter and Amend Judgment – filed 10/22/2015 .....	Vol. XXXIII - 3982
North Idaho Resorts, LLC's Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure – filed 09/19/2014 .....	Vol. VII - 860
North Idaho Resorts, LLC's Motion for Entry of Default (Genesis Golf Builders) – filed 10/25/2013 .....	Vol. III - 407
Notice of Amended Appeal (NIR, LLC) – filed 10/06/2016 .....	Vol. LVII - 7031
Notice of Amended Appeal (NIR, LLC) (Continued) – filed 10/06/2016 .....	Vol. LVIII - 7071
Notice of Amended Appeal (NIR, LLC) (Continued) – filed 10/06/2016 .....	Vol. LIX - 7212
Notice of Appeal (NIR) – filed 09/09/2016 .....	Vol. IL - 5941
Notice of Appeal (NIR) (Continued) – filed 09/09/2016 .....	Vol. L - 6041
Notice of Appeal (VP, Inc.) – filed 10/06/2016 .....	Vol. LVI - 6828
Notice of Appeal (VP, Inc.) (Continued) – filed 10/06/2016 .....	Vol. LVII - 6932
Notice of Appeal by JV, LLC – filed 09/20/2016.....	Vol. LI - 6137
Notice of Appeal by JV, LLC (Continued) – filed 09/20/2016 .....	Vol. LII - 6267
Notice of Appearance – filed 09/29/2011 .....	Vol. II - 290
Notice of Appearance – filed 10/14/2010 .....	Vol. II - 233
Notice of Change of Firm Affiliation – filed 07/18/2014 .....	Vol. V - 643
Notice of Denial of Oral Argument for Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/23/2016 .....	Vol. LIV - 6578
Notice of Filing Proposed Order – filed 04/26/2017 .....	Vol. LXXVIII - 9838
Notice of Hearing – filed 11/03/2016 .....	Vol. LX - 7357
Notice of Hearing on North Idaho Resorts, LLC and VP, Inc.'s Objection to Lodged Record and Objection to Certificate of Mailing of Clerk's Record – filed 04/26/2017 .....	Vol. LXXVIII - 9836
Notice of Hearing on Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 01/20/2015 .....	Vol. XVIII - 2070
Notice of Hearing on Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVIII - 3329
Notice of Hearing on Valiant Idaho, LLC's Motion to Clarify Court's Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/20/2017 .....	Vol. LXXV - 9409
Notice of Levy (268811) – filed 10/31/2016 .....	Vol. LIX - 7283
Notice of Levy (268813) – filed 10/31/2016 .....	Vol. LIX - 7291
Notice of Levy (268815) – filed 10/31/2016 .....	Vol. LIX - 7300



Notice of Levy Under Writ of Execution – filed 09/21/2016 .....	Vol. LIII - 6508
Notice of Levy Under Writ of Execution – filed 12/22/2016 .....	Vol. LXII - 7657
Notice of Sheriff’s Sale – filed 09/21/2016 .....	Vol. LIV - 6531
Notice of Sheriff’s Sale – filed 12/22/2016 .....	Vol. LXIII - 7715
Notice of Sheriff’s Sale (268812) – filed 10/31/2016.....	Vol. LIX - 7288
Notice of Sheriff’s Sale (268814) – filed 10/31/2016.....	Vol. LIX - 7297
Notice of Sheriff’s Sale (268816) – filed 10/31/2016.....	Vol. LIX - 7306
Notice of Special Appearance – filed 08/21/2015 .....	Vol. XXVIII - 3334
Notice re: Proposed Judgment (as Between Defendant VP, Inc. and North Idaho Resorts and the Defendant JV, LLC) – filed 09/17/2015.....	Vol. XXX - 3545
Notice to Counsel – filed 04/06/2017 .....	Vol. LXXVI - 9453
Objection to Lodged Record and Objection to Certificate of Mailing of Clerk’s Record – filed 04/25/2017 .....	Vol. LXXVIII - 9825
Objection to Lodged Record and Objection to Certificate of Mailing of Clerk’s Record – filed 04/26/2017	Vol. LXXIX - 9844
Objection to Motion for an Order of Sale of Real Property – filed 08/04/2015 .....	Vol. XXV - 2981
Objection to Proposed Final Judgment – filed 07/07/2015 .....	Vol. XXIV - 2844
Objection to Valiant Idaho’s Second Motion for an Order of Sale of Real Property – filed 06/29/2016 .....	Vol. XLI - 5015
Order Denying JV, LLC’s Request for Oral Argument – filed 08/03/2016.....	Vol. XLV - 5540
Order Denying Motions to Strike – filed 04/27/2016 .....	Vol. XXXVII - 4487
Order Denying VP, Inc.’s Request for Oral Argument on Motion to Alter, Amend and Reconsider – filed 08/04/2016 .....	Vol. XLVI - 5575
Order Denying VP, Incorporated’s Motion to Dismiss Third Party Complaint – filed 11/19/2014 .....	Vol. X - 1174
Order Dismissing all Claims with Prejudice against Interstate Concrete and Asphalt Company – filed 09/13/2012	Vol. II - 330
Order Dismissing R.C. Worst & Company, and All Claims, Counterclaims, and Cross Claims thereof Pursuant to Oral Offer of Resolution Advanced to the Court on May 28, 2014 – filed 06/02/2014.....	Vol. V - 636
Order Extending the Temporary Restraining Order Against VP, Incorporated – filed 04/20/2017...	Vol. LXXVIII - 9819
Order for Entry of Default (Genesis Golf Builders) – filed 08/15/2013 .....	Vol. III - 386
Order for Entry of Default (Genesis Golf Builders) – filed 11/01/2013 .....	Vol. III - 423
Order for Entry of Default (Genesis Golf Builders, Inc.) – filed 08/29/2013 .....	Vol. III - 392

Order for Entry of Default Against Amy Korengut – filed 12/10/2014.....	Vol. XII - 1495
Order for Entry of Default Against Bar K, Inc. – filed 02/03/2015 .....	Vol. XXI - 2353
Order for Entry of Default Against C.E. Kramer Crane & Contracting, Inc. – filed 12/10/2014 .....	Vol. XII - 1515
Order for Entry of Default Against Cross-defendant T-O Engineers, Inc. – filed 09/26/2014 .....	Vol. VII - 896
Order for Entry of Default Against Genesis Golf Builders, Inc. – filed 12/10/2014 .....	Vol. XII - 1507
Order for Entry of Default Against Independent Mortgage Ltd. Co. – filed 01/06/2015 .....	Vol. XIII - 1633
Order for Entry of Default Against Montaheno Investments, LLC – filed 12/10/2014 .....	Vol. XII - 1501
Order for Entry of Default Against Netta Source, LLC – filed 12/10/2014 .....	Vol. XII - 1527
Order for Entry of Default Against Third Party Defendant Pend Oreille Bonner Development Holdings, Inc. – filed 10/21/2014.....	Vol. VIII - 969
Order for Entry of Default Against Third Party Defendants Frederick J. Grant and Christine Grant – filed 05/29/2015 ... Vol. XXIV - 2773	
Order for Entry of Default Against Timberline Investments, LLC – filed 01/06/2015 .....	Vol. XIII - 1639
Order Granting Appellant JV, LLC’s Objection to Clerk’s Record and Motion to Make Additions to Clerk’s Record – filed 05/05/2017.....	Vol. LXXIX - 9928
Order Granting Appellants VP, Incorporated’s and North Idaho Resorts, LLC’s Objections to Lodged Record and Objections to Certificate of Mailing – filed 05/01/2017.....	Vol. LXXIX - 9879
Order Granting Cross-defendant, VP, Incorporated’s Request for Extension of Time to Answer or Otherwise Plead to Valiant, LLC’s Amended Answer to Allege a Counter-Claim and Cross-Claim and to Serve Third Party – filed 12/03/2014 .....	Vol. XI - 1379
Order Granting Defendant Wells Fargo’s Motion to Dismiss with Prejudice – filed 03/16/2012 .....	Vol. II - 312
Order Granting Defendants North Idaho Resorts, LLC and VP, Incorporated’s Motion for Enlargement of Time to File Answers and Responses to Discovery Requests Propounded by Valiant Idaho, LLC – filed 03/12/2015	Vol. XXII - 2557
Order Granting Injunction – filed 04/28/2017 .....	Vol. LXXIX - 9871
Order Granting Leave for Withdrawal of Attorney – filed 05/18/2011 .....	Vol. II - 260
Order Granting Motion to Enlarge Time to Respond to VP, Incorporated’s Motion to Dissolve Temporary Restraining Order – filed 04/17/2017.....	Vol. LXXVIII - 9742
Order Granting R.E. Loans, LLC’s Motion to Lift Automatic Stay (Mortgage Fund '08 LLC) – filed 08/12/2013	Vol. III - 374
Order Granting R.E. Loans, LLC’s Request to Lift Automatic Stay – filed 08/24/2012.....	Vol. II - 325
Order Granting Respondent Valiant Idaho, LLC’s Objection to the Consolidated Clerk’s Record on Appeal – filed 05/03/2017.....	Vol. LXXIX - 9900
Order Granting Valiant Idaho, LLC Leave to Amend Answer to Allege a Counterclaim and Cross-Claim – filed 11/19/2014 .....	Vol. X - 1164

Order Granting Valiant Idaho, LLC Leave to Serve its Third Party Complaint – filed 11/19/2014 .....	Vol. X - 1160
Order Imposing Rule 11 Sanctions – filed 12/06/2016.....	Vol. LX - 7458
Order of Entry of Default Against Russ Capital Group, LLC – filed 12/10/2014 .....	Vol. XII - 1521
Order of Reassignment – filed 10/09/2014 .....	Vol. VIII - 963
Order on Stipulation to Entry of Judgment Against Charles W. Reeves and Ann B. Reeves – filed 11/20/2014 ...	Vol. XI - 1317
Order on Stipulation to Entry of Judgment Against Dan S. Jacobson, Sage Holdings LLC and Steven G. Lazar – filed 01/06/2015 .....	Vol. XIII - 1645
Order on Stipulation to Entry of Judgment Against First American Title Company of Idaho – filed 12/17/2014	Vol. XIII - 1576
Order on Stipulation to Entry of Judgment Against Idaho Club Homeowner’s Association, Inc. – filed 01/15/2015 .	Vol. XIV - 1700
Order on Stipulation to Entry of Judgment Against Mountain West Bank – filed 02/06/2015 .....	Vol. XXII - 2473
Order on Stipulation to Entry of Judgment Against Pend Oreille Bonner Development Holdings, Inc. – filed 11/20/2014 .....	Vol. XI - 1276
Order on Stipulation to Entry of Judgment Against Pend Oreille Bonner Development, LLC – filed 11/20/2014	Vol. XI - 1296
Order on Valiant Idaho, LLC’s Application for an Extension to Respond to VP, Incorporated’s Motion for Order Allowing Use and Access of Parcels 1 and 2 – filed 03/28/2017 .....	Vol. LXXV - 9421
Order on Valiant Idaho, LLC’s Motion for a Temporary Restraining Order Against VP, Incorporated – filed 04/13/2017	Vol. LXXVII - 9707
Order on Valiant Idaho, LLC’s Motion for an Injunction Against VP, Incorporated – filed 04/26/2017.....	Vol. LXXIX - 9853
Order Partially Vacating the Court’s May 1, 2017 Order Granting NIR’s and VP’s Objection to Lodged Record – filed 05/03/2017 .....	Vol. LXXIX - 9904
Order re: JV, LLC’s Motion and Application for Stay of Execution Upon Posting a Cash Deposit – filed 02/21/2017 .....	Vol. LXXI - 8822
Order re: JV, LLC’s Third Party Claim and Motion for Stay of Execution – filed 11/04/2016 .....	Vol. LX - 7399
Order re: Proposed Judgment and Proposed Decree of Foreclosure – filed 07/18/2016 .....	Vol. XLIII - 5303
Order re: Sale of Real Property – filed 07/14/2016 .....	Vol. XLIII - 5270
Order re: Valiant Idaho LLC’s Motions <i>In Limine</i> – filed 12/29/2015 .....	Vol. XXXV - 4266
Order Regarding Disqualification of Judge – filed 10/06/2014.....	Vol. VIII - 953
Order Requesting Response Brief from Valiant Idaho, LLC – filed 03/27/2017 .....	Vol. LXXV - 9413
Order Requiring Submissions – filed 07/14/2016.....	Vol. XLIII - 5264

Order Setting Trial and Pretrial Order – filed 09/03/2015 .....	Vol. XXX - 3521
Order Settling Trial and Pretrial Order – filed 11/20/2014 .....	Vol. X - 1270
Order Shortening Time to Have Heard Valiant Idaho, LLC’s (1) Motion Contesting JV, LLC’s Third Party Claim; and Opposition to JV, LLC’s Motion for Stay of Execution; and (2) Motion for Sanctions under IC 12-123 and IRCP 11 – filed 11/03/2016 .....	Vol. LX - 7372
Order Substituting Valiant Idaho, LLC in Place of Mortgage Fund ’08 LLC as the Real Party in Interest – filed 11/19/2014 .....	Vol. X - 1171
Order Substituting Valiant Idaho, LLC in Place of Pensco Trust Co. as the Real Party in Interest – filed 11/19/2014	Vol. X - 1168
Order Substituting Valiant Idaho, LLC in Place of R.E. Loans, LLC as the Real Party in Interest – filed 08/07/2014 .....	Vol. V - 667
Order Substituting Valiant Idaho, LLC in Place of Wells Fargo Capital Finance, LLC as the Real Party in Interest – filed 09/12/2014 .....	Vol. VI - 781
Order Vacating Decree of Foreclosure Entered on August 5, 2015 – filed 09/17/2015 .....	Vol. XXX - 3549
Order Vacating Decree of Foreclosure entered on June 22, 2016 – filed 07/14/2016 .....	Vol. XLIII - 5268
Order Vacating Judgment – filed 07/14/2016 .....	Vol. XLIII - 5266
Order Vacating Judgment Entered on August 5, 2015 – filed 09/17/2015 .....	Vol. XXX - 3552
R.C. Worst & Company, Inc.’s Motion for Entry of Default (Genesis Golf Builders) – filed 08/14/2013 ....	Vol. III - 378
R.E. Loans, LLC’s Answer to Complaint – filed 04/21/2011.....	Vol. II - 245
R.E. Loans, LLC’s Memorandum in Support of its Motion for Summary Judgment Against Cross-claimant ACI Northwest, Inc. – filed 04/29/2014 .....	Vol. III - 441
R.E. Loans, LLC’s Memorandum in Support of its Motion for Summary Judgment Against Cross-claimant R.C. Worst & Company, Inc. – filed 04/29/2014 .....	Vol. IV - 491
R.E. Loans, LLC’s Motion for Entry of Default (Genesis Golf Builders) – filed 08/12/2013.....	Vol. III - 362
R.E. Loans, LLC’s Motion for Summary Judgment Against Cross-Claimant ACI Northwest, Inc. – filed 04/29/2014 .....	Vol. III - 438
R.E. Loans, LLC’s Motion for Summary Judgment Against Cross-Claimant R.C. Worst & Company, Inc. – filed 04/29/2014.....	Vol. IV - 488
R.E. Loans, LLC’s Motion to Lift Automatic Stay (Mortgage Fund ’08 LLC) – filed 06/26/2013 .....	Vol. II - 336
R.E. Loans, LLC’s Request to Lift the Automatic Stay – filed 06/28/2012 .....	Vol. II - 317
Renewed Motion for Reconsideration and Clarification – filed 06/16/2015 .....	Vol. XXIV - 2781
Reply by R.E. Loans, LLC to Cross-claim by ACI Northwest, Inc. – filed 02/04/2011.....	Vol. II - 237
Reply Memorandum in Support of Motion for Order Allowing Use and Access of Parcels 1 and 2 and Application for Stay of Enforcement of Order Granting Valiant Idaho, LLC’s Motion to Enforce Judgment – filed 04/17/2017 .....	Vol. LXXVIII - 9745

Reply Memorandum in Support of Renewed Motion for Reconsideration and Clarification – filed 07/07/2015 .....	Vol. XXIV - 2837
Reply Memorandum in Support of Valiant Idaho, LLC’s Motion <i>In Limine</i> re: North Idaho Resorts, LLC and VP, Inc. – filed 12/28/2015 .....	Vol. XXXV - 4243
Reply Memorandum in Support of Valiant Idaho, LLC’s Motion <i>In Limine</i> re: JV, LLC – filed 12/28/2015	Vol. XXXV - 4253
Reply Memorandum to Valiant’s Opposition to Motion for New Trial – filed 08/15/2016 .....	Vol. XLVII - 5787
Reply to Defendants North Idaho Resorts, LLC’s and VP, Incorporated’s Memorandum in Opposition to Valiant Idaho, LLC’s Motion to Strike Inadmissible Evidence – filed 10/21/2015 .....	Vol. XXXIII - 3962
Reply to JV, LLC’s Response to Valiant Idaho, LLC’s Motion to Strike Inadmissible Evidence – filed 10/21/2015..	Vol. XXXIII - 3955
Request for Judicial Notice – filed 02/04/2015 .....	Vol. XXI - 2372
ROA Report for Case CV2009-1810 – printed May 10, 2017.....	Vol. I - 65
Second Subpoena Duces Tecum to First American Title Company – filed 09/18/2015.....	Vol. XXX - 3620
Sheriff’s Certificate of Sale (Idaho Club – Parcel 1) – filed 12/22/2016 .....	Vol. LXII - 7747
Sheriff’s Certificate of Sale (Idaho Club – Parcel 10) – filed 12/22/2016 .....	Vol. LXII - 7767
Sheriff’s Certificate of Sale (Idaho Club – Parcel 100) – filed 12/22/2016 .....	Vol. LXV - 8039
Sheriff’s Certificate of Sale (Idaho Club – Parcel 101) – filed 12/22/2016 .....	Vol. LXV - 8042
Sheriff’s Certificate of Sale (Idaho Club – Parcel 102) – filed 12/22/2016 .....	Vol. LXV - 8045
Sheriff’s Certificate of Sale (Idaho Club – Parcel 103) – filed 12/22/2016 .....	Vol. LXV - 8048
Sheriff’s Certificate of Sale (Idaho Club – Parcel 104) – filed 12/22/2016 .....	Vol. LXV - 8051
Sheriff’s Certificate of Sale (Idaho Club – Parcel 105) – filed 12/22/2016 .....	Vol. LXV - 8054
Sheriff’s Certificate of Sale (Idaho Club – Parcel 106) – filed 12/22/2016 .....	Vol. LXV - 8057
Sheriff’s Certificate of Sale (Idaho Club – Parcel 107) – filed 12/22/2016 .....	Vol. LXV - 8060
Sheriff’s Certificate of Sale (Idaho Club – Parcel 108) – filed 12/22/2016 .....	Vol. LXV - 8063
Sheriff’s Certificate of Sale (Idaho Club – Parcel 109) – filed 12/22/2016 .....	Vol. LXV - 8066
Sheriff’s Certificate of Sale (Idaho Club – Parcel 11) – filed 12/22/2016 .....	Vol. LXII - 7770
Sheriff’s Certificate of Sale (Idaho Club – Parcel 110) – filed 12/22/2016 .....	Vol. LXV - 8069
Sheriff’s Certificate of Sale (Idaho Club – Parcel 111) – filed 12/22/2016 .....	Vol. LXV - 8072
Sheriff’s Certificate of Sale (Idaho Club – Parcel 112) – filed 12/22/2016 .....	Vol. LXV - 8075
Sheriff’s Certificate of Sale (Idaho Club – Parcel 113) – filed 12/22/2016 .....	Vol. LXV - 8078

Sheriff's Certificate of Sale (Idaho Club – Parcel 114) – filed 12/22/2016 .....	Vol. LXV - 8081
Sheriff's Certificate of Sale (Idaho Club – Parcel 115) – filed 12/22/2016 .....	Vol. LXV - 8084
Sheriff's Certificate of Sale (Idaho Club – Parcel 116) – filed 12/22/2016 .....	Vol. LXV - 8087
Sheriff's Certificate of Sale (Idaho Club – Parcel 117) – filed 12/22/2016 .....	Vol. LXV - 8090
Sheriff's Certificate of Sale (Idaho Club – Parcel 118) – filed 12/22/2016 .....	Vol. LXV - 8093
Sheriff's Certificate of Sale (Idaho Club – Parcel 119) – filed 12/22/2016 .....	Vol. LXV - 8097
Sheriff's Certificate of Sale (Idaho Club – Parcel 12) – filed 12/22/2016 .....	Vol. LXII - 7773
Sheriff's Certificate of Sale (Idaho Club – Parcel 120) – filed 12/22/2016 .....	Vol. LXV - 8100
Sheriff's Certificate of Sale (Idaho Club – Parcel 122) – filed 12/22/2016 .....	Vol. LXV - 8103
Sheriff's Certificate of Sale (Idaho Club – Parcel 123) – filed 12/22/2016 .....	Vol. LXV - 8106
Sheriff's Certificate of Sale (Idaho Club – Parcel 124) – filed 12/22/2016 .....	Vol. LXV - 8109
Sheriff's Certificate of Sale (Idaho Club – Parcel 125) – filed 12/22/2016 .....	Vol. LXV - 8112
Sheriff's Certificate of Sale (Idaho Club – Parcel 126) – filed 12/22/2016 .....	Vol. LXV - 8115
Sheriff's Certificate of Sale (Idaho Club – Parcel 127) – filed 12/22/2016 .....	Vol. LXV - 8118
Sheriff's Certificate of Sale (Idaho Club – Parcel 128) – filed 12/22/2016 .....	Vol. LXV - 8121
Sheriff's Certificate of Sale (Idaho Club – Parcel 129) – filed 12/22/2016 .....	Vol. LXVI - 8124
Sheriff's Certificate of Sale (Idaho Club – Parcel 13) – filed 12/22/2016 .....	Vol. LXII - 7776
Sheriff's Certificate of Sale (Idaho Club – Parcel 130) – filed 12/22/2016 .....	Vol. LXVI - 8127
Sheriff's Certificate of Sale (Idaho Club – Parcel 131) – filed 12/22/2016 .....	Vol. LXVI - 8130
Sheriff's Certificate of Sale (Idaho Club – Parcel 132) – filed 12/22/2016 .....	Vol. LXVI - 8133
Sheriff's Certificate of Sale (Idaho Club – Parcel 133) – filed 12/22/2016 .....	Vol. LXVI - 8136
Sheriff's Certificate of Sale (Idaho Club – Parcel 134) – filed 12/22/2016 .....	Vol. LXVI - 8139
Sheriff's Certificate of Sale (Idaho Club – Parcel 135) – filed 12/22/2016 .....	Vol. LXVI - 8142
Sheriff's Certificate of Sale (Idaho Club – Parcel 136) – filed 12/22/2016 .....	Vol. LXVI - 8145
Sheriff's Certificate of Sale (Idaho Club – Parcel 137) – filed 12/22/2016 .....	Vol. LXVI - 8148
Sheriff's Certificate of Sale (Idaho Club – Parcel 138) – filed 12/22/2016 .....	Vol. LXVI - 8151
Sheriff's Certificate of Sale (Idaho Club – Parcel 139) – filed 12/22/2016 .....	Vol. LXVI - 8154
Sheriff's Certificate of Sale (Idaho Club – Parcel 14) – filed 12/22/2016 .....	Vol. LXII - 7779
Sheriff's Certificate of Sale (Idaho Club – Parcel 140) – filed 12/22/2016 .....	Vol. LXVI - 8157

Sheriff's Certificate of Sale (Idaho Club – Parcel 141) – filed 12/22/2016 .....	Vol. LXVI - 8160
Sheriff's Certificate of Sale (Idaho Club – Parcel 142) – filed 12/22/2016 .....	Vol. LXVI - 8163
Sheriff's Certificate of Sale (Idaho Club – Parcel 143) – filed 12/22/2016 .....	Vol. LXVI - 8166
Sheriff's Certificate of Sale (Idaho Club – Parcel 144) – filed 12/22/2016 .....	Vol. LXVI - 8169
Sheriff's Certificate of Sale (Idaho Club – Parcel 145) – filed 12/22/2016 .....	Vol. LXVI - 8172
Sheriff's Certificate of Sale (Idaho Club – Parcel 146) – filed 12/22/2016 .....	Vol. LXVI - 8175
Sheriff's Certificate of Sale (Idaho Club – Parcel 147) – filed 12/22/2016 .....	Vol. LXVI - 8178
Sheriff's Certificate of Sale (Idaho Club – Parcel 148) – filed 12/22/2016 .....	Vol. LXVI - 8181
Sheriff's Certificate of Sale (Idaho Club – Parcel 149) – filed 12/22/2016 .....	Vol. LXVI - 8184
Sheriff's Certificate of Sale (Idaho Club – Parcel 15) – filed 12/22/2016 .....	Vol. LXII - 7782
Sheriff's Certificate of Sale (Idaho Club – Parcel 150) – filed 12/22/2016 .....	Vol. LXVI - 8187
Sheriff's Certificate of Sale (Idaho Club – Parcel 151) – filed 12/22/2016 .....	Vol. LXVI - 8190
Sheriff's Certificate of Sale (Idaho Club – Parcel 152) – filed 12/22/2016 .....	Vol. LXVI - 8193
Sheriff's Certificate of Sale (Idaho Club – Parcel 153) – filed 12/22/2016 .....	Vol. LXVI - 8196
Sheriff's Certificate of Sale (Idaho Club – Parcel 154) – filed 12/22/2016 .....	Vol. LXVI - 8199
Sheriff's Certificate of Sale (Idaho Club – Parcel 155) – filed 12/22/2016 .....	Vol. LXVI - 8202
Sheriff's Certificate of Sale (Idaho Club – Parcel 156) – filed 12/22/2016 .....	Vol. LXVI - 8205
Sheriff's Certificate of Sale (Idaho Club – Parcel 157) – filed 12/22/2016 .....	Vol. LXVI - 8208
Sheriff's Certificate of Sale (Idaho Club – Parcel 158) – filed 12/22/2016 .....	Vol. LXVI - 8211
Sheriff's Certificate of Sale (Idaho Club – Parcel 159) – filed 12/22/2016 .....	Vol. LXVI - 8214
Sheriff's Certificate of Sale (Idaho Club – Parcel 16) – filed 12/22/2016 .....	Vol. LXII - 7785
Sheriff's Certificate of Sale (Idaho Club – Parcel 163) – filed 12/22/2016 .....	Vol. LXVI - 8219
Sheriff's Certificate of Sale (Idaho Club – Parcel 17) – filed 12/22/2016 .....	Vol. LXII - 7788
Sheriff's Certificate of Sale (Idaho Club – Parcel 177) – filed 12/22/2016 .....	Vol. LXVI - 8223
Sheriff's Certificate of Sale (Idaho Club – Parcel 19) – filed 12/22/2016 .....	Vol. LXII - 7791
Sheriff's Certificate of Sale (Idaho Club – Parcel 2) – filed 12/22/2016 .....	Vol. LXII - 7750
Sheriff's Certificate of Sale (Idaho Club – Parcel 20) – filed 12/22/2016 .....	Vol. LXII - 7795
Sheriff's Certificate of Sale (Idaho Club – Parcel 21) – filed 12/22/2016 .....	Vol. LXII - 7798
Sheriff's Certificate of Sale (Idaho Club – Parcel 22) – filed 12/22/2016 .....	Vol. LXII - 7801

Sheriff's Certificate of Sale (Idaho Club – Parcel 23) – filed 12/22/2016 .....	Vol. LXII - 7804
Sheriff's Certificate of Sale (Idaho Club – Parcel 24) – filed 12/22/2016 .....	Vol. LXII - 7807
Sheriff's Certificate of Sale (Idaho Club – Parcel 25) – filed 12/22/2016 .....	Vol. LXII - 7810
Sheriff's Certificate of Sale (Idaho Club – Parcel 26) – filed 12/22/2016 .....	Vol. LXII - 7813
Sheriff's Certificate of Sale (Idaho Club – Parcel 27) – filed 12/22/2016 .....	Vol. LXII - 7816
Sheriff's Certificate of Sale (Idaho Club – Parcel 28) – filed 12/22/2016 .....	Vol. LXII - 7819
Sheriff's Certificate of Sale (Idaho Club – Parcel 29) – filed 12/22/2016 .....	Vol. LXII - 7822
Sheriff's Certificate of Sale (Idaho Club – Parcel 30) – filed 12/22/2016 .....	Vol. LXII - 7825
Sheriff's Certificate of Sale (Idaho Club – Parcel 31) – filed 12/22/2016 .....	Vol. LXII - 7828
Sheriff's Certificate of Sale (Idaho Club – Parcel 32) – filed 12/22/2016 .....	Vol. LXII - 7831
Sheriff's Certificate of Sale (Idaho Club – Parcel 33) – filed 12/22/2016 .....	Vol. LXII - 7834
Sheriff's Certificate of Sale (Idaho Club – Parcel 34) – filed 12/22/2016 .....	Vol. LXII - 7837
Sheriff's Certificate of Sale (Idaho Club – Parcel 35) – filed 12/22/2016 .....	Vol. LXII - 7840
Sheriff's Certificate of Sale (Idaho Club – Parcel 36) – filed 12/22/2016 .....	Vol. LXII - 7843
Sheriff's Certificate of Sale (Idaho Club – Parcel 37) – filed 12/22/2016 .....	Vol. LXII - 7846
Sheriff's Certificate of Sale (Idaho Club – Parcel 38) – filed 12/22/2016 .....	Vol. LXII - 7849
Sheriff's Certificate of Sale (Idaho Club – Parcel 39) – filed 12/22/2016 .....	Vol. LXIV - 7852
Sheriff's Certificate of Sale (Idaho Club – Parcel 40) – filed 12/22/2016 .....	Vol. LXIV - 7855
Sheriff's Certificate of Sale (Idaho Club – Parcel 41) – filed 12/22/2016 .....	Vol. LXIV - 7858
Sheriff's Certificate of Sale (Idaho Club – Parcel 42) – filed 12/22/2016 .....	Vol. LXIV - 7861
Sheriff's Certificate of Sale (Idaho Club – Parcel 43) – filed 12/22/2016 .....	Vol. LXIV - 7864
Sheriff's Certificate of Sale (Idaho Club – Parcel 44) – filed 12/22/2016 .....	Vol. LXIV - 7867
Sheriff's Certificate of Sale (Idaho Club – Parcel 45) – filed 12/22/2016 .....	Vol. LXIV - 7870
Sheriff's Certificate of Sale (Idaho Club – Parcel 46) – filed 12/22/2016 .....	Vol. LXIV - 7873
Sheriff's Certificate of Sale (Idaho Club – Parcel 47) – filed 12/22/2016 .....	Vol. LXIV - 7876
Sheriff's Certificate of Sale (Idaho Club – Parcel 48) – filed 12/22/2016 .....	Vol. LXIV - 7879
Sheriff's Certificate of Sale (Idaho Club – Parcel 49) – filed 12/22/2016 .....	Vol. LXIV - 7881
Sheriff's Certificate of Sale (Idaho Club – Parcel 5) – filed 12/22/2016 .....	Vol. LXII - 7754
Sheriff's Certificate of Sale (Idaho Club – Parcel 50) – filed 12/22/2016 .....	Vol. LXIV - 7884





Sheriff's Certificate of Sale (Idaho Club – Parcel 8) – filed 12/22/2016 .....	Vol. LXII - 7761
Sheriff's Certificate of Sale (Idaho Club – Parcel 80) – filed 12/22/2016 .....	Vol. LXIV - 7978
Sheriff's Certificate of Sale (Idaho Club – Parcel 81) – filed 12/22/2016 .....	Vol. LXIV - 7981
Sheriff's Certificate of Sale (Idaho Club – Parcel 82) – filed 12/22/2016 .....	Vol. LXIV - 7984
Sheriff's Certificate of Sale (Idaho Club – Parcel 83) – filed 12/22/2016 .....	Vol. LXV - 7987
Sheriff's Certificate of Sale (Idaho Club – Parcel 84) – filed 12/22/2016 .....	Vol. LXV - 7990
Sheriff's Certificate of Sale (Idaho Club – Parcel 85) – filed 12/22/2016 .....	Vol. LXV - 7993
Sheriff's Certificate of Sale (Idaho Club – Parcel 86) – filed 12/22/2016 .....	Vol. LXV - 7996
Sheriff's Certificate of Sale (Idaho Club – Parcel 87) – filed 12/22/2016 .....	Vol. LXV - 7999
Sheriff's Certificate of Sale (Idaho Club – Parcel 88) – filed 12/22/2016 .....	Vol. LXV - 8002
Sheriff's Certificate of Sale (Idaho Club – Parcel 89) – filed 12/22/2016 .....	Vol. LXV - 8005
Sheriff's Certificate of Sale (Idaho Club – Parcel 9) – filed 12/22/2016 .....	Vol. LXII - 7764
Sheriff's Certificate of Sale (Idaho Club – Parcel 90) – filed 12/22/2016 .....	Vol. LXV - 8008
Sheriff's Certificate of Sale (Idaho Club – Parcel 91) – filed 12/22/2016 .....	Vol. LXV - 8011
Sheriff's Certificate of Sale (Idaho Club – Parcel 92) – filed 12/22/2016 .....	Vol. LXV - 8014
Sheriff's Certificate of Sale (Idaho Club – Parcel 93) – filed 12/22/2016 .....	Vol. LXV - 8017
Sheriff's Certificate of Sale (Idaho Club – Parcel 94) – filed 12/22/2016 .....	Vol. LXV - 8020
Sheriff's Certificate of Sale (Idaho Club – Parcel 95) – filed 12/22/2016 .....	Vol. LXV - 8023
Sheriff's Certificate of Sale (Idaho Club – Parcel 96) – filed 12/22/2016 .....	Vol. LXV - 8027
Sheriff's Certificate of Sale (Idaho Club – Parcel 97) – filed 12/22/2016 .....	Vol. LXV - 8030
Sheriff's Certificate of Sale (Idaho Club – Parcel 98) – filed 12/22/2016 .....	Vol. LXV - 8033
Sheriff's Certificate of Sale (Idaho Club – Parcel 99) – filed 12/22/2016 .....	Vol. LXV - 8036
Sheriff's Certificate on Return of Service, Writ of Execution – filed 04/06/2017 .....	Vol. LXXV - 9446
Sheriff's Certificate on Return of Service, Writ of Execution (NIR) – filed 11/18/2016 .....	Vol. LX - 7411
Sheriff's Certificate on Return of Service, Writ of Execution (VP, Inc.)– filed 11/18/2016 .....	Vol. LX - 7424
Sheriff's Return on Sale – filed 12/22/2016 .....	Vol. LXII - 7680
Sheriff's Return on Writ of Execution – filed 12/22/2016 .....	Vol. LXII - 7714
Sheriff's Service on Writ of Execution – filed 09/21/2016 .....	Vol. LIII - 6507
Special Appearance on Behalf of Defendant Mortgage Fund '08, LLC – filed 10/05/2010 .....	Vol. II - 228

Special Appearance on Behalf of Defendant Pensco Trust Co., Custodian FBO Barney Ng – filed 05/24/2010 . Vol. II - 201	
Stay Order (Mortgage Fund '08, LLC) – filed 09/29/2011.....	Vol. II - 284
Stay Order (R.E. Loans, LLC) – filed 09/29/2011.....	Vol. II - 275
Stipulation for Settlement and Dismissal of JV, LLC’s Third Party Complaint Against Idaho Club Homeowner’s Association, Inc. – filed 01/09/2015.....	Vol. XIII - 1666
Stipulation for Settlement and for Judgment as Between Defendant VP, Inc. and North Idaho Resorts and the Defendant JV, LLC – filed 08/24/2015 .....	Vol. XXVIII - 3340
Stipulation to Entry of Judgment Against Charles W. Reeves and Anna B. Reeves – filed 11/19/2014.....	Vol. X - 1200
Stipulation to Entry of Judgment Against Dan S. Jacobson; Sage Holdings, LLC; and Steven G. Lazar – filed 01/02/2015 .....	Vol. XIII - 1611
Stipulation to Entry of Judgment Against First American Title Company of Idaho – filed 12/17/2014 .....	Vol. XIII - 1555
Stipulation to Entry of Judgment Against Idaho Club Homeowner’s Association, Inc. – filed 01/12/2015.....	Vol. XIII - 1673
Stipulation to Entry of Judgment Against Mountain West Bank – filed 02/04/2015 .....	Vol. XXI - 2452
Stipulation to Entry of Judgment Against Pend Oreille Bonner Development, LLC – filed 11/19/2014 .....	Vol. X - 1178
Stipulation to Entry of Judgment Against Pend Oreille Bonner Development Holdings, Inc. – filed 11/19/2014 .	Vol. X - 1221
Subpoena Duces Tecum to First American Tile Company – filed 09/18/2015 .....	Vol. XXX - 3555
Substitution of Counsel – filed 08/29/2011 .....	Vol. II - 264
Summons on Third Party Complaint brought by Third Party Plaintiff Valiant Idaho, LLC [Pend Oreille Bonner Development Holdings, Inc.] – filed 09/03/2014 .....	Vol. VI - 768
Supplemental Declaration of Jeff R. Sykes in Support of Memorandum in Reply to JV, LLC’s Memorandum in Opposition to Valiant Idaho, LLC’s Motion for Summary Judgment – filed 03/11/2015.....	Vol. XXII - 2528
Supplemental Memorandum in Support of Valiant Idaho, LLC’s Motion Contesting JV, LLC’s Third Party Claim; and Opposition to JV, LLC’s Motion for Stay of Execution – filed 11/04/2016 .....	Vol. LX - 7387
Supreme Court Order re: 44583 - Consolidating Appeal nos. 44583, 44584 and 44585 – filed 11/04/2016 ....	Vol. I - 166
Supreme Court Order re: 44584 - Consolidating Appeal nos. 44583, 44584 and 44585 – filed 11/04/2016 ....	Vol. I - 168
Supreme Court Order re: 44585 - Consolidating Appeal nos. 44583, 44584 and 44585 – filed 11/04/2016 ....	Vol. I - 170
Table of Contents.....	Vol. I - 3
Third Party Defendant Idaho Club Homeowner’s Association, Inc.’s Motion and Memorandum to Dismiss Claim Asserted by Third Party Plaintiff JV, LLC – filed 11/07/2014.....	Vol. VIII - 996
Third Party Defendant Panhandle Management, Incorporated’s Motion and Memorandum to Dismiss Claims Asserted by Third Party Plaintiff JV, LLC – filed 11/07/2014.....	Vol. VIII - 1006

Title Page .....	Vol. I - 1
Valiant Idaho, LLC's Amended Request for Additional Transcript and Record on Appeal – filed 10/20/2016 .....	Vol. I - 7279
Valiant Idaho, LLC's Amended Request for Additional Transcript and Record on Appeal – filed 01/30/2017 .....	Vol. LXVII - 8254
Valiant Idaho, LLC's Application for an Extension to Respond to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 03/28/2017 .....	Vol. LXXV - 9418
Valiant Idaho, LLC's Closing Argument – filed 03/14/2016 .....	Vol. XXXVII - 4444
Valiant Idaho, LLC's Counterclaim, Cross-claim and Third Party Complaint for Judicial Foreclosure – filed 08/19/2014 .....	Vol. VI - 739
Valiant Idaho, LLC's Identification of Trial Exhibits – filed 01/14/2016 .....	Vol. XXXVI - 4286
Valiant Idaho, LLC's Identification of Trial Witnesses – filed 01/14/2016 .....	Vol. XXXVI - 4294
Valiant Idaho, LLC's Memorandum in Opposition to JV, LLC's Motion to Alter, Amend, and Reconsider re: (1) Memorandum Decision and Order; (2) Judgment; (3) Decree of Foreclosure; and (4) Order of Sale – filed 08/10/2016 ..	Vol. XLVI - 5584
Valiant Idaho, LLC's Memorandum in Opposition to JV, LLC's Objection and Motion to Disallow Memorandum of Costs and Attorney's Fees – filed 08/11/2016 .....	Vol. XLVII - 5728
Valiant Idaho, LLC's Memorandum in Opposition to VP, Inc.'s Motion for a New Trial – filed 08/10/2016	Vol. XLVI - 5577
Valiant Idaho, LLC's Memorandum in Opposition to VP, Inc.'s Motion to Alter, Amend and Reconsider the Decree of Foreclosure and Judgment – filed 08/10/2016 .....	Vol. XLVI - 5673
Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, and Application for Stay of Enforcement of Order Granting Motion to Enforce Judgment – filed 04/12/2017 .....	Vol. LXXVII - 9665
Valiant Idaho, LLC's Memorandum in Opposition to VP, Incorporated's Motion to Dissolve Temporary Restraining Order – filed 04/18/2017 .....	Vol. LXXVIII - 9790
Valiant Idaho, LLC's Memorandum in Reply to VP, Incorporated's Opposition to Motion to Clarify Court's Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 04/03/2017	Vol. LXXV - 9436
Valiant Idaho, LLC's Memorandum in Response to VP, Inc.'s Objection and Motion to Disallow Memorandum of Costs and Attorney's Fees – filed 08/11/2016 .....	Vol. XLVII - 5746
Valiant Idaho, LLC's Memorandum in Support of Motion for a Temporary Restraining Order and Preliminary Injunction Against VP, Incorporated – filed 04/13/2017 .....	Vol. LXXVII - 9686
Valiant Idaho, LLC's Memorandum in Support of Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 08/11/2016 .....	Vol. XLVII - 5770
Valiant Idaho, LLC's Memorandum in Support of Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 11/03/2016 .....	Vol. LX - 7378

Valiant Idaho, LLC's Memorandum of Costs and Attorney's Fees – filed 07/06/2016 .....	Vol. XLI - 5019
Valiant Idaho, LLC's Memorandum of Costs and Attorneys' Fees Against JV, LLC – filed 11/25/2016 ...	Vol. LX - 7438
Valiant Idaho, LLC's Motion Contesting JV, LLC's Third Party Claim; and Opposition to JV, LLC's Motion for Stay of Execution – filed 11/03/2016.....	Vol. LX - 7361
Valiant Idaho, LLC's Motion for a Temporary Restraining Order and Preliminary Injunction Against VP, Incorporated – filed 04/13/2017.....	Vol. LXXVII - 9683
Valiant Idaho, LLC's Motion for an Order of Sale of Real Property – filed 07/22/2015 .....	Vol. XXV - 2880
Valiant Idaho, LLC's Motion for an Order of Sale of Real Property – filed 06/22/2016 .....	Vol. XLI - 4985
Valiant Idaho, LLC's Motion for Entry of Default Against Counter-Defendant Genesis Golf Builders, Inc. – filed 12/08/2014.....	Vol. XI - 1382
Valiant Idaho, LLC's Motion for Entry of Default Against Cross-defendant T-O Engineers, Inc. – filed 09/26/2014. Vol. VII - 879	
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Pend Oreille Bonner Development Holdings, Inc. – filed 10/03/2014 .....	Vol. VII - 913
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Amy Korengut – filed 12/08/2014 .....	Vol. XI - 1394
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Independent Mortgage Ltd. Co. – filed 12/08/2014.....	Vol. XII - 1414
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant C.E. Kramer Crane & Contracting, Inc. – filed 12/08/2014 .....	Vol. XII - 1429
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Netta Source, LLC – filed 12/08/2014 .....	Vol. XII - 1444
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Montaheno Investments, LLC – filed 12/08/2014 .....	Vol. XII - 1459
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Russ Capital Group, LLC – filed 12/08/2014 .....	Vol. XII - 1474
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Timberline Investments, LLC – filed 12/22/2014 .....	Vol. XIII - 1596
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendant Bar K, Inc. – filed 02/02/2015.....	Vol. XX - 2337
Valiant Idaho, LLC's Motion for Entry of Default Against Third Party Defendants Frederick J. Grant and Christine Grant – filed 05/22/2015.....	Vol. XXIV - 2749
Valiant Idaho, LLC's Motion for Entry of Final Judgment – filed 05/20/2015.....	Vol. XXII - 2600
Valiant Idaho, LLC's Motion for Leave to Amend Third Party Complaint to Join an Additional Party – filed 11/24/2014 .....	Vol. XI - 1337
Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/21/2016 .....	Vol. LIV - 6562

Valiant Idaho, LLC's Motion for Sanctions Under IC 12-123 and IRCP 11 – filed 11/03/2016 .....	Vol. LX - 7375
Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC; North Idaho Resorts, LLC; and VP, Incorporated – filed 01/20/2015 .....	Vol. XIV - 1720
Valiant Idaho, LLC's Motion <i>In Limine</i> re: JV, LLC – filed 12/15/2015.....	Vol. XXXIV - 4034
Valiant Idaho, LLC's Motion <i>In Limine</i> re: North Idaho Resorts, LLC and VP, Inc. – filed 12/15/2015 ....	Vol. XXXIV - 4032
Valiant Idaho, LLC's Motion to Alter, Amend and/or Reconsider the Order of Sale of Real Property – filed 08/19/2015 .....	Vol. XXVII - 3249
Valiant Idaho, LLC's Motion to Amend Decree of Foreclosure – filed 08/19/2015 .....	Vol. XXVII - 3240
Valiant Idaho, LLC's Motion to Clarify Court's Memorandum Decision and Order Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/20/2017 .....	Vol. LXXV - 9399
Valiant Idaho, LLC's Motion to Enforce Judgment Under IAR 13 (b)(10) and 13 (b)(13) – filed 02/08/2017 .....	Vol. LXVII - 8268
Valiant Idaho, LLC's Motion to Strike Inadmissible Evidence – filed 10/09/2015 .....	Vol. XXXI - 3733
Valiant Idaho, LLC's Notice of Depost – filed 04/13/2017.....	Vol. LXXVIII - 9711
Valiant Idaho, LLC's Notice of Hearing on VP, Incorporated's Motion for Order Allowing Use and Access of Parcels 1 and 2, etc. – filed 03/28/2017 .....	Vol. LXXV - 9415
Valiant Idaho, LLC's Notice of Intent to Take Default – filed 09/10/2014 .....	Vol. VI - 776
Valiant Idaho, LLC's Notice of Intent to Take Default – filed 09/25/2014 .....	Vol. VII - 874
Valiant Idaho, LLC's Notice of Intent to Take Default – filed 10/03/2014 .....	Vol. VII - 911
Valiant Idaho, LLC's Notice of Intent to Take Default – filed 12/08/2014 .....	Vol. XII - 1489
Valiant Idaho, LLC's Notice of Non-Objection to JV, LLC's Motion and Application for Stay of Execution Upon Posting a Cash Deposit, and Errata Thereto – filed 02/16/2017 .....	Vol. LXX - 8743
Valiant Idaho, LLC's Notice of Objection to the Consolidated Clerk's Record on Appeal – filed 05/02/2017.....	Vol. LXXIX - 9883
Valiant Idaho, LLC's Objection to JV, LLC's Proposed Judgment Submitted 09/10/2015 (As Between Defendants JV, LLC and North Idaho Resorts, LLC/VP Incorporated) – filed 09/16/2015 .....	Vol. XXX - 3538
Valiant Idaho, LLC's Objections and Opposition to North Idaho Resorts, LLC and VP, Incorporated's Motion to Reconsider and Motion to Alter and Amend Judgment – filed 10/01/2015 .....	Vol. XXXI - 3721
Valiant Idaho, LLC's Reply to: (1) JV LLC's Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third-party Complaint for Judicial Foreclosure; and (2) JV LLC's Cross-claim and Third Party Complaint – filed 12/15/2014 .....	Vol. XII - 1541
Valiant Idaho, LLC's Request for Additional Transcript and Record on Appeal – filed 09/23/2016 .....	Vol. LIV - 6581
Valiant Idaho, LLC's Request for Additional Transcript and Record on Appeal – filed 10/07/2016 .....	Vol. LIX - 7238
Valiant Idaho, LLC's Request for Additional Transcript and Record on Appeal – filed 10/20/2016 .....	Vol. LIX - 7268

Valiant Idaho, LLC's Response and Objections to JV, LLC's Post-trial Memorandum and Argument – filed 05/26/2016	Vol. XXXVII - 4574
Valiant Idaho, LLC's Response and Rebuttal to VP, Inc.'s Closing Argument – filed 05/26/2016	Vol. XXXVIII - 4551
Valiant Idaho, LLC's Second Motion to Strike Inadmissible Evidence – filed 10/20/2015	Vol. XXXIII - 3940
Valiant Idaho, LLC's Third Motion for Summary Judgment – filed 09/25/2015	Vol. XXX - 3623
Valiant Idaho, LLC's Trial Brief – filed 01/21/2016	Vol. XXXVI - 4306
Valiant Idaho, LLC's Trial Brief – filed 01/25/2016	Vol. XXXVI - 4394
VP Inc.'s Motion to Strike the Declaration of William Haberman – filed 04/21/2016	Vol. XXXVII - 4482
VP Incorporated's Answer to JV, LLC's Cross-Claim – filed 08/21/2015	Vol. XXVIII - 3337
VP, Inc. and NIR, LLC's Memorandum in Opposition to Valiant Idaho, LLC's Motion for Relief from Automatic Stay – filed 09/28/2016	Vol. LIV - 6597
VP, Inc.'s Amended Exhibit List – filed 01/15/2016	Vol. XXXVI - 4298
VP, Inc.'s Amended Supplemental Expert Witness Disclosure – filed 01/08/2016	Vol. XXXV - 4269
VP, Inc.'s Amended Supplemental Expert Witness Disclosure – filed 01/11/2016	Vol. XXXV - 4273
VP, Inc.'s and North Idaho Resorts, LLC's Response to Valiant's Motion <i>In Limine</i> – filed 12/22/2015	Vol. XXXV - 4221
VP, Inc.'s Exhibit List – filed 01/14/2016	Vol. XXXVI - 4278
VP, Inc.'s Expert Witness Disclosure – filed 11/27/2015	Vol. XXXIV - 4020
VP, Inc.'s Lay Witness Disclosure – filed 11/27/2015	Vol. XXXIV - 4024
VP, Inc.'s Memorandum in Opposition to Valiant Idaho, LLC's Motion to Enforce Judgment – filed 02/17/2017	Vol. LXX - 8746
VP, Inc.'s Memorandum in Opposition to Valiant Idaho, LLC's Motion to Clarify Court's Memorandum Decision and Order and Granting Valiant Idaho, LLC's Motion to Enforce Judgment – filed 03/29/2017	Vol. LXXV - 9424
VP, Inc.'s Motion for a New Trial – filed 08/03/2016	Vol. XLV - 5542
VP, Inc.'s Motion for New Trial – filed 08/03/2016	Vol. XLV - 5544
VP, Inc.'s Motion to Alter, Amend, and Reconsider the Decree of Foreclosure and Judgment – filed 08/03/2016	Vol. XLVI - 5553
VP, Inc.'s Motion to Amend Answer to Assert an Affirmative Defense – filed 01/27/2016	Vol. XXXVII - 4413
VP, Inc.'s Opposition to Valiant Idaho's Memorandum of Costs and Attorney Fees – filed 07/20/2016	Vol. XLV - 5503
VP, Inc.'s Supplemental Expert Witness Disclosure – filed 12/04/2015	Vol. XXXIV - 4027
VP, Incorporated's Answer to Valiant Idaho, LLC's Counterclaim, Cross-claim and Third-party Complaint for Judicial Foreclosure – filed 12/11/2014	Vol. XII - 1533

VP, Incorporated's Motion to Dismiss Third Party Complaint – filed 10/06/2014 .....	Vol. VIII - 959
VP, Incorporated's Reply on Motion to Dismiss Third Party Complaint and Response to Motion to Amend Pleadings – filed 11/14/2014.....	Vol. X - 1156
VP's Closing Argument – filed 05/12/2016 .....	Vol. XXXVII - 4535
Wells Fargo's Motion to Dismiss with Prejudice – filed 01/23/2012.....	Vol. II - 298
Withdrawal of Application for Stay - filed 11/22/2016.....	Vol. LX - 7436
Writ of Assistance – filed 03/06/2017 .....	Vol. LXXV - 9361
Writ of Assistance – filed 04/11/2017 .....	Vol. LXXVII - 9635
Writ of Execution – filed 09/21/2016 .....	Vol. LII - 6318
Writ of Execution – filed 10/05/2016.....	Vol. LIV - 6611
Writ of Execution – filed 12/22/2016 .....	Vol. LXI - 7464
Writ of Execution (Continued) – filed 09/21/2016 .....	Vol. LIII - 6396
Writ of Execution (Continued) – filed 10/05/2016.....	Vol. LV - 6667
Writ of Execution (Continued) – filed 10/05/2016.....	Vol. LVI - 6801
Writ of Execution (Continued) – filed 12/22/2016 .....	Vol. LXII - 7594
Writ of Execution Against JV, LLC – filed 01/09/2017 .....	Vol. LXVI - 8232
Writ of Execution Against JV, LLC – filed 04/06/2017 .....	Vol. LXXVI - 9448
Writ of Execution Against JV, LLC – filed 10/06/2016 .....	Vol. LVI - 6814
Writ of Execution Against JV, LLC for Boundary County – filed 01/30/2017.....	Vol. LXVII - 8262
Writ of Execution Against JV, LLC for Boundary County – filed 10/13/2016 .....	Vol. LIX - 7255
Writ of Execution Against JV, LLC for Boundary County (268815) – filed 10/31/2016 .....	Vol. LIX - 7303
Writ of Execution Against North Idaho Resorts, LLC – filed 10/06/2016.....	Vol. LVI - 6806
Writ of Execution Against North Idaho Resorts, LLC for Boundary County – filed 10/13/2016 .....	Vol. LIX - 7260
Writ of Execution Against North Idaho Resorts, LLC for Boundary County (268813) – filed 10/31/2016 .....	Vol. LIX - 7294
Writ of Execution Against North Idaho Resorts, LLC for Boundary County – filed 11/18/2016 .....	Vol. LX - 7413
Writ of Execution Against VP, Incorporated – filed 10/06/2016 .....	Vol. LVI - 6822
Writ of Execution Against VP, Incorporated for Boundary County – filed 10/13/2016.....	Vol. LIX - 7265
Writ of Execution Against VP, Incorporated for Boundary County – filed 11/18/2016.....	Vol. LX - 7426
Writ of Execution Against VP, Incorporated for Boundary County (268811) – filed 10/31/2016.....	Vol. LIX - 7285



Susan P. Weeks, ISB No. 4255  
JAMES, VERNON & WEEKS, PA  
1626 Lincoln Way  
Coeur d'Alene, Idaho 83814  
Telephone: (208) 667-0683  
Facsimile: (208) 664-1684  
sweeks@jvwlaw.net

STATE OF IDAHO  
County of Bonner  
FILED Aug 3 2016<sup>ss</sup>  
AT 3:40 O'CLOCK P.M.  
CLERK, DISTRICT COURT  
[Signature]  
Deputy

Attorneys for Defendants North Idaho Resorts, LLC and VP, Incorporated

IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNER

GENESIS GOLF BUILDERS, INC., formerly  
known as NATIONAL GOLF BUILDERS,  
INC., a Nevada corporation,

Plaintiff,

vs.

PEND OREILLE BONNER  
DEVELOPMENT, LLC, a Nevada limited  
liability company; et al.,

Defendants.

Case No. CV-2009-1810

DECLARATION OF WEEKS IN SUPPORT  
OF VP INC'S MOTION FOR NEW TRIAL

AND RELATED COUNTER, CROSS  
AND THIRD PARTY ACTIONS  
PREVIOUSLY FILED HEREIN

Pursuant to Rule 7(d) of the Idaho Rules of Civil Procedure and Idaho Code § 9-1406, Susan P. Weeks declares as follows:

1. I am over the age of 18, and competent to testify to the matters set forth herein. I make this Declaration of my own personal knowledge, and have personal knowledge of the facts herein contained.

DECLARATION OF WEEKS IN SUPPORT OF VP INC'S MOTION FOR NEW TRIAL: 1

2. On October 30, 2015, this Court entered a Memorandum Decision and Order holding “[t]he only issue remaining for the court trial is whether thye 2007 RE Loans Note (Loan No. P0099) and the Pensco Note (Loan No. P0106) have been satisfied.”
3. On December 29, 2015, this Court entered an Order RE: Motion *In Limine* which held: “Valiant’s motion for an order precluding defendants NIR, VP and JV from presenting evidence at trial relating to any issue other than whether the 2007 RE Loans Note and/or the Pensco Note have been satisfied is granted.” A footnote further indicated “This ruling does not preclude the defendants from introducing evidence of payment made in partial satisfaction of the outstanding mortgages and not credited thereto, if any.”
4. The Court also made more than one oral pronouncement that the trial was an evidentiary hearing limited to this very specific scope.
5. It was a surprise when the Court allowed testimony of operating losses and diesel remediation damages Valiant was seeking to have awarded to them. These damages were not requested in the cross claim/third party complaint filed by Valiant. They were not included in the discovery provided by Valiant. They were outside the scope of the limited area the Court indicated would be considered at trial. Further, the trial exhibits supporting these matters were disclosed shortly before trial, outside the disclosure deadline.
6. Preliminary investigation into the diesel spill indicates it occurred on a lot owned by Andrew Goulder, which is not one of the lots which was the subject of this foreclosure. Further discovery from Valiant would be necessary to ascertain if this fact is correct.

**I HEREBY CERTIFY AND DECLARE**, under penalty of perjury pursuant to the laws of the State of Idaho, that the foregoing is true and correct.

DATED this 3<sup>rd</sup> day of August, 2016.

Susan P. Weeks  
Susan P. Weeks

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following persons in the manner indicated this 3<sup>rd</sup> day of August, 2016:

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Facsimile: 208-263-8211

Gary A. Finney  
FINNEY FINEY & FINNEY, PA  
120 E Lake St., Ste. 317  
Sandpoint, ID 83864

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Facsimile: 208-489-0110

Richard Stacey  
Jeff Sykes  
McConnell Wagner Sykes & Stacey, PLLC  
827 E. Park Blvd., Ste. 201  
Boise, ID 83712

Susan P. Weeks

Susan P. Weeks, ISB No. 4255  
 Daniel M. Keyes, ISB No. 9492  
 JAMES, VERNON & WEEKS, PA  
 1626 Lincoln Way  
 Coeur d'Alene, Idaho 83814  
 Telephone: (208) 667-0683  
 Facsimile: (208) 664-1684  
sweeks@jvwlaw.net

STATE OF IDAHO  
 County of Bonner } ss  
 FILED 8-3-16  
 AT 5:00 O'CLOCK P M  
 CLERK, DISTRICT COURT  
 Deputy [Signature]

Attorneys for Defendants North Idaho Resorts, LLC and VP, Incorporated

IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT  
 OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNER

GENESIS GOLF BUILDERS, INC., formerly  
 known as NATIONAL GOLF BUILDERS,  
 INC., a Nevada corporation,

Plaintiff,

vs.

PEND OREILLE BONNER  
 DEVELOPMENT, LLC, a Nevada limited  
 liability company; et al.,

Defendants.

Case No. CV-2009-1810

VP INC'S MOTION TO ALTER, AMEND,  
 AND RECONSIDER THE DECREE OF  
 FORECLOSURE AND JUDGMENT

AND RELATED COUNTER, CROSS  
 AND THIRD PARTY ACTIONS  
 PREVIOUSLY FILED HEREIN

COMES NOW VP, Inc. ("VP"), by and through its attorneys of record, James, Vernon & Weeks, P.A., and hereby moves the Court pursuant to Rules 11.2(b)(1) and 59(e) of the Idaho Rules of Civil Procedure to reconsider, amend, and alter the Court's Decree of Foreclosure and Judgment, each entered separately on July 20, 2016, in the above-matter.

VP INC'S MOTION TO ALTER, AMEND, AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT: 1

This motion is supported by the Memorandum in Support of Motion to Alter, Amend, and Reconsider the Decree of Foreclosure and Judgment filed concurrently herewith.

Oral argument is requested.

DATED this 3rd day of August, 2016.

JAMES, VERNON & WEEKS, P.A.

By Daniel M. Keyes  
Daniel M. Keyes

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following persons in the manner indicated this 3rd day of August, 2016:

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Facsimile: 208-263-8211

Gary A. Finney  
FINNEY FINNEY & FINNEY, PA  
120 E Lake St., Ste. 317  
Sandpoint, ID 83864

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Facsimile: 208-489-0110


Richard Stacey  
Jeff Sykes  
McCormell Wagner Sykes & Stacey, PLLC  
827 E. Park Blvd., Ste. 201  
Boise, ID 83712

Christine Chouse

VP INC'S MOTION TO ALTER, AMEND, AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT: 2

Susan P. Weeks, ISB No. 4255  
 Daniel M. Keyes, ISB #9492  
 JAMES, VERNON & WEEKS, PA  
 1626 Lincoln Way  
 Coeur d'Alene, Idaho 83814  
 Telephone: (208) 667-0683  
 Facsimile: (208) 664-1684  
sweeks@jvwlaw.net

STATE OF IDAHO  
 COUNTY OF BONNER  
 FIRST JUDICIAL DISTRICT  
 AUG 14 2014  
 CLERK



Attorneys for Defendants North Idaho Resorts, LLC and VP, Incorporated

IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT  
 OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNER

GENESIS GOLF BUILDERS, INC., formerly  
 known as NATIONAL GOLF BUILDERS,  
 INC., a Nevada corporation,

Plaintiff,

vs.

PEND OREILLE BONNER  
 DEVELOPMENT, LLC, a Nevada limited  
 liability company; et al.,

Defendants.

Case No. CV-2009-1810

MEMORANDUM IN SUPPORT OF VP  
 INC'S MOTION TO ALTER, AMEND,  
 AND RECONSIDER THE DECREE OF  
 FORECLOSURE AND JUDGMENT

AND RELATED COUNTER, CROSS  
 AND THIRD PARTY ACTIONS  
 PREVIOUSLY FILED HEREIN

COMES NOW VP, Inc. ("VP"), by and through its attorneys of record, James, Vernon & Weeks, P.A., and hereby submit this memorandum in support of its Motion to Alter, Amend, and Reconsider the Decree of Foreclosure and Judgment.

MEMORANDUM IN SUPPORT OF VP INC'S MOTION TO ALTER, AMEND, AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT: I

## INTRODUCTION

On June 22, 2016, this Court entered a Decree of Foreclosure and a separate Judgment. The Decree of Foreclosure contemplated that the Court would enter an order of sale identifying the order and manner in which the real property subject to the various mortgages shall be sold. That same day Valiant Idaho, LLC ("Valiant") filed a Motion for Order of Sale of Real Property and a Memorandum in Support of that Motion.

Hearing was held on July 6, 2016, for Valiant's Motion for Order of Sale of Real Property. At the hearing the Court heard argument for and against the order of sale proposed by Valiant. Two exceedingly important arguments were brought to the Court's attention at that hearing: First, the proposed order of sale did not account for the junior liens of JV, LLC ("JV") which currently encumber much of the real property subject to this foreclosure action. In fact, neither the Decree of Foreclosure, nor the Judgment, each entered on June 22, 2016, adequately addressed or identified the real property subject to JV's mortgage. Second, the Decree of Foreclosure and the Judgment did not meet the requirements of a final judgment under Idaho Rule of Civil Procedure 54 and the statutory foreclosure requirements of Title 6 Chapter 1. Recognizing the deficiencies of the Decree of Foreclosure and Judgment, the Court at hearing rescinded each. Later on July 14, 2016, the Court entered Orders rescinding both the Decree of Foreclosure and the Judgment entered June 22, 2016.

On the same day, July 14, 2016, the Court vacated the Decree of Foreclosure and the Judgment in this case, and entered its ORDER re: Order of Sale of Real Property. That order is almost identical to that proposed by Valiant with the exception of a couple of changes in order of sale of individual parcels.

On July 20, 2016, the Court entered a Judgment and separate Decree of Foreclosure. That Decree of Foreclosure contains a section ordering the sale of real property similar but different than the July 14, 2016, order. The July 20, 2016, Decree of Foreclosure, Section C beginning at page 7, includes an order of sale similar to the prior orders entered by the Court, but modified to include JV's mortgage. Both the July 20, 2016, Decree of Foreclosure and Judgment contain errors discussed below and therefore, JV requests that this Court alter, amend, and reconsider each.

### ARGUMENT

The order of sale within the Decree of Foreclosure is similar to the prior orders of sale entered by the Court. Each order of sale to this date has failed to accurately account for JV, LLC's ("JV") mortgage interests and each improperly applies the "two funds rule." Also, the Judgment improperly awards Valiant interests not subject to or encumbered by its mortgages. Lastly, the Decree of Foreclosure the Judgment, and all orders of sale need to be combined into one judgment to satisfy the rule on final appealable judgments.

**A. The Decree of Foreclosure Improperly Marshalls the Junior Lien Holder Interests and Fails to Accurately Reflect JV, LLC's Lien Interests**

Valiant has argued "[i]n accordance with the 'two funds rule,' Valiant asks this Court to order the sale of the parcels encumbered by one of the Valiant Mortgages first; the parcels encumbered by two of the Valiant Mortgages second; and the parcels encumbered by all three of the Valiant Mortgages third." Memo. in Support of Valiant's Motion for Order of Sale of Real Property, 5 (June 22, 2016). However, this approach is wrong because it misapplied the "two funds rule." Instead of relying on the "two funds rule" the order of sale should have been based in large part on the inverse order of alienation rule. Because the two funds rule was applied in



the order of sale proposed by Valiant and entered by this Court, the Court should reconsider its Decree of Foreclosure with respect to the order of the sale of property.

Marshaling is an equitable doctrine that “rests upon the principle that a creditor having two funds to satisfy his debt may not, by his application of them to his demand, defeat another creditor, who may resort to only one of the funds.” *In re Bair Auction Co., Inc.*, No. 04-40825, 2006 WL 2621089, at \*3 (Bankr. D. Idaho Sept. 12, 2006) citing *Meyer v. United States*, 375 U.S. 233, 237 (1963). The Idaho Supreme Court in 1897 said “[t]he doctrine of marshaling securities is well established, and fully recognized.” *Wooddy v. Jameson*, 5 Idaho 466, 50 P. 1008, 1009 (1897). However, “[a]lthough Idaho recognizes the doctrine of marshaling, there is little case law available to consult.” *In re Bair Auction Co., Inc.*, No. 04-40825, 2006 WL 2621089, at \*3 (Bankr. D. Idaho Sept. 12, 2006). It is therefore appropriate to consult other jurisdictions and sources of guidance on the doctrine of marshaling. *Id.*

At the request of Valiant, this Court has considered and adopted the Restatement 3d of Property, which contains two principles to address the order of sale of real property with multiple encumbrances: the “two funds rule” and the inverse order of alienation rule. The “two funds rule” states “[W]hen foreclosing a mortgage covering more than one parcel of real estate...the mortgagee must proceed against the parcels in the following order: Parcels on which **no subordinate interests exist** are foreclosed upon before parcels on which subordinate interests exist.” Restatement 3d of Property: *Mortgages*, § 8.6 – *Marshaling: Order of Foreclosure on Multiple Parcels* (1997). As the comments to the Restatement explain, under subsection (a)(1), “a mortgagee must exhaust its security in parcels unencumbered by junior interests before resorting to parcels that are so encumbered. The objective of this rule is to avoid destroying junior interests unless it is necessary to do so.” *Id.* at comment (b). According to the plain

language of the restatement, the “two funds rule” only applies when there are parcels with “no subordinate interests” that can first be foreclosed on to protect the junior lien holder(s). This rule is only applicable to two (2) grouping of property subject to this action: a group of property (5 parcels) encumbered only by the MF08 mortgage identified as group “b” below, and a single parcel, parcel 121, encumbered only by the JV mortgage, identified as group “f” below. All other property in this action is encumbered by more than one mortgage and therefore, not subject to the “two funds rule.”<sup>1</sup> Most importantly for the Court to consider, there is no property encumbered solely by the RE Loans mortgage, which is the first priority mortgage of the bunch.

When the “two funds rule” is inapplicable to the sale of real property that all has subordinate interests, the courts turn to the doctrine of inverse order of alienation, described in subsection (a)(2) of the Restatement 3d of Property, § 8.6:

(a) [W]hen foreclosing a mortgage covering more than one parcel of real estate...the mortgagee must proceed against the parcels in the following order:

- . . . . .
- (2) As among parcels on which subordinate interests exist, those with subordinate interests created more recently are foreclosed upon before those with subordinate interests created at a more remote time.

Subsection (a)(2) “is an expansion of the “two funds” rule of Subsection (a)(1), and provides a guideline for determining the order of foreclosure when more than one parcel is encumbered with a subordinate interest.” Restatement 3d of Property, § 8.6, comment (c). The inverse order of alienation rule is based upon the principle that a later junior mortgagee should not be able to modify the expectations of another junior mortgagee who has a superior interest.

<sup>1</sup> Valiant’s Memorandum in Support of its Motion for Order of Sale asked the Court to erroneously apply the “two funds rule” by asking the Court to “order the sale of the parcels encumbered by one of the Valiant Mortgages first; the parcels encumbered by two of the Valiant Mortgages second; and the parcels encumbered by all three of the Valiant Mortgages third.” *Id.* at 5. That clearly violates the plain language of the “two funds rule.”

The inverse order of alienation rule is explained in Illustration 5 in comment (f) to the Restatement 3d of Property, § 8.6:

Mortgagor borrows money from Mortgagee-1, giving Mortgagee-1 a promissory note secured by a mortgage on Blackacre and Whiteacre. Subsequently Mortgagor borrows an additional sum from Mortgagee-2, giving a mortgage on Blackacre alone to secure repayment of that debt. Thereafter Mortgagor borrows further funds from Mortgagee-3, giving Mortgagee-3 a mortgage on Whiteacre alone to secure repayment. Mortgagor defaults in payment on the note secured by the first mortgage, and Mortgagee-1 initiates a foreclosure proceeding on Blackacre and Whiteacre. At Mortgagee-2's request, Mortgagee-1 will be required to foreclose first on Whiteacre, and may foreclose on Blackacre only if the proceeds of the foreclosure on Whiteacre are insufficient to discharge fully the debt owed to Mortgagee-1.

Restatement 3d of Property: *Mortgages*, § 8.6 – *Marshalling: Order of Foreclosure on Multiple Parcels*, comment (f)(5) (1997). Illustration 5 is visually depicted as follows:

	PARCELS	
	Blackacre	Whiteacre
Oldest	Mortgagee-1	Mortgagee-1
↓	Mortgagee-2	-----
Newest	-----	Mortgagee-3

The reasoning behind the conclusion in Illustration 5 is that, when Mortgagee-2 acquires its lien, it “can reasonably expect, under the “two funds” doctrine of Subsection (a)(1), that Whiteacre will be exhausted before Blackacre in the event the blanket mortgage is foreclosed.” *Id.* at comment (f)(6). “The ‘inverse order’ rule simply holds that a subsequent encumbrance or transfer of Whiteacre by Mortgagor should not be permitted to modify this expectation of Mortgagee-2.” *Id.* Using the same rule, if Mortgagee-2 was to foreclose on its mortgage before Mortgagee-1 or Mortgagee-3, Mortgagee-2 would first have to sell Blackacre to best protect Mortgagee-3's lien. There would be no need to consider Mortgagee-1's interests because those superior liens would survive the foreclosure.

As mentioned above, case law in Idaho is nonexistent on this issue. Courts outside of Idaho, however, have considered cases with facts similar to those presented in this case. One such case is *Ball v. Setzer*, 33 W. Va. 444, 10 S.E. 798 (1890). The facts of *Ball* were as follows. The debtor owned five tracts of land, described by their acreages: 48, 57, 84, 100, and 200. Each of these properties was encumbered by at least one mortgage, with some having four mortgages or liens. The first lienor, McCulloch, received a deed of trust on the 48, 57, and 200 acre parcels. The second lienor, Miller, obtained a judgment in favor of all the parcels. The third lienor, Setzer, received deeds of trust for parcels 48, 57, 84, and 100. And finally, the fourth lienor was Ball, who received a judgment in favor of all the parcels. This scenario is visually depicted as follows:

	PARCELS				
	48	57	84	100	200
Oldest	McCulloch	McCulloch	-----	-----	McCulloch
↓	Miller	Miller	Miller	Miller	Miller
	Setzer	Setzer	Setzer	Setzer	-----
	Newest	Ball	Ball	Ball	Ball

When the debtor defaulted on his payments to McCulloch, the court was tasked with determining the order of sale of the properties, applying the doctrine of marshalling. The court concluded:

McCulloch's debt, by the decree of sale, should have been paid first out of the 200 acres, if they were adequate for its payment, and, if not, then out of the forty-eight and the fifty-seven acres. Why so? Because Setzer had a lien on the forty-eight and the fifty-seven acres, but none on the 200 acres, while McCulloch's debt bound all three. This is clearly the rule as between McCulloch and Setzer. McCulloch could not exhaust the forty eight and the fifty seven acres, take these away from Setzer, and not touch the 200 acres but he must, on the contrary exhaust that before he can touch the forty eight and fifty seven acres. Then comes Miller, with a lien on all the tracts. But has Setzer any right to dictate that Miller shall, in the first instance, look to any particular tract? Certainly he has, and for the same reason which enabled Setzer to compel McCulloch to go first on the 200 acres; that is, that Miller has all five of the tracks at his command, while Setzer has only four of them. Therefore Setzer could demand that Miller go first on the

200 acres, on which Setzer had no lien, for any balance of its proceeds left after paying McCulloch, so as to leave Setzer's tracts to answer his debt.

Thus, as between these three lienors, McCulloch, Miller, and Setzer, by this process we recognize the preference of McCulloch over Miller, and of both McCulloch and Miller over Setzer; but by throwing them first on the 200 acres, and on its inadequacy on the forty eight and the fifty seven acres, we preserve, as far as possible consistently with their rights, the tracts on which Setzer has a lien for his payment.

*Ball v. Setzer*, 33 W.Va. 444, 447, 10 S.E. 798, 799 (1890).

The court in *Ball* recognized its interpretation and order of sale would harm Ball, the fourth mortgagee. *Id.* However, the court concluded this didn't matter because Ball was "subsequent in time and right" to the other lienors, and therefore, his claims had to be settled last. *Id.*

The Supreme Court of Michigan in *Sibley v. Baker*, 23 Mich. 312 (1871), applied the inverse order of alienation rule to reach a similar result. The facts of *Sibley* were as follows. The debtor had three parcels. *Sibley*, 23 Mich. at 313. He executed a first mortgage on all three parcels in favor of Sibley, a second mortgage on parcels 1 and 2 also in favor of Sibley, and a third mortgage on parcels 2 and 3 in favor of Winchester. *Id.* The result was that parcel 1 was encumbered by first and second mortgages, parcel 2 was encumbered by first, second, and third mortgages, and parcel three was encumbered by first and second mortgages. *Id.* This scenario is depicted as follows:

	Parcels		
	1	2	3
Oldest	Sibley	Sibley	Sibley
↓	Sibley	Sibley	-----
Newest	-----	Winchester	Winchester

Upon default of the debtor, and foreclosure under the first position mortgage, the court determined parcel 3 must be sold first. *Id.* at 315 ("[T]he sale of the parcels shall be decreed to

be made in the inverse order of their alienation. This rule, as between the first and second mortgages, requires parcel three to be first sold when the former is foreclosed.”). Rejecting Winchester’s argument that Parcel 1 should be sold first to protect his lien, since Sibley had a lien on all three Parcels, the court determined this made no difference to the analysis:

This rule, as between the first and second mortgages, requires parcel three to be first sold when the former is foreclosed. If those mortgages had been given to different persons, this would be conceded; but we think it can make no difference that both were given to the same person. We perceive no reason in the fact of complainant holding one mortgage which should make a second any less available to him as a legal security, than it would have been if taken by a third person; and it could not be equally available if a purchaser under it would not be equally protected.

*Id.* (Emphasis added). The court concluded, if the third mortgagor had succeeded in forcing the court to sell parcel 1 first, the second mortgagee would have been deprived of a substantial right of priority. *See id.* Thus, when marshaling the sale of properties with multiple liens, the Court considers the priority of each lien separately, regardless of whether the same party is the beneficiary of multiple liens.

In applying the equitable doctrine of marshaling to the groupings of real property subject to the various lien interests in this case, the Court erred when it applied the “two funds rule” instead of the inverse order of alienation rule and when it failed to treat each mortgage separately based on its priority without respect to the common interest of Valiant in each of the three most senior mortgages. Adapting the grouping of parcels subject to Valiant’s foreclosure action as set forth in the Decree of Foreclosure entered July 20, 2016,<sup>2</sup> the grouping of parcels and respective liens are depicted as follows:

---

<sup>2</sup> The property groupings used in the following table are based on pages 7-8 of the Decree of Foreclosure, Section C.1. However, where a particular grouping failed to accurately reflect JV’s mortgage, that interest was added to the chart (e.g. group “a” failed to account for JV’s mortgage encumbering each of the subject parcels). Where the failure to accurately reflect JV’s mortgage caused a division within a group, the parcels originally included in that group and not encumbered by JV’s mortgage retain the original letter designation (e.g. groups “d” and “e”), and those

PROPERTY GROUPINGS <sup>3</sup>								
	a	b	c	d	d1	e	e1	f <sup>4</sup>
Oldest	RE	-----	RE	-----	-----	RE	RE	-----
↓	-----	-----	-----	PEN	PEN	PEN	PEN	-----
	-----	MF08	MF08	MF08	MF08	MF08	MF08	-----
Newest	JV	-----	-----	-----	JV	-----	JV	JV

As evident upon review of the above chart, all of the real property encumbered by the first priority RE Loans mortgage is secured by at least one other mortgage. Therefore, the "two funds rule" is inapplicable, and the Court should order the sale of real property according to the inverse order of alienation rule.

The starting point of analysis is to determine whether any of the properties are encumbered only by the RE Loans mortgage since it is the first in time/priority among all of the mortgages. If there is any property encumbered only by that mortgage, then the "two funds rule" requires that property to be sold first. However, there are no properties encumbered only by the RE Loans mortgage.

The next step is to proceed under the inverse order of alienation rule, which requires that out of the four (4) total groupings encumbered by the RE Loans mortgage (a,c,e, and e1), those which are not encumbered by Pensco's second priority mortgage (a and c) are sold first.

Deciding the order of sale as between a and c, protecting MF08's security would require that a be sold first, then c. Finishing off with groupings e and e1, Pensco's and MF08 both have the same

---

parcels within that original letter designation that are also encumbered by the JV mortgage are depicted here with the original letter designation followed by a "1" (e.g. groups "d1" and "e1"). The purpose of this chart is to accurately reflect the status of each grouping of parcels with relation to their encumbrances and the priority/timing of those encumbrances. This starting point is necessary to apply the inverse order of alienation rule to the various mortgages.

<sup>3</sup> These property groupings were compiled by reviewing Exhibits A through D of the Judgment and the Decree of Foreclosure, both entered on July 20, 2016. An exhaustive description of these groupings is provided here at Appendix A, identifying each and every parcel of real property subject to this action according to those exhibits.

<sup>4</sup> If the Court does determine that Parcel 121 is also encumbered by the RE Loans mortgage as argued in Section B below in this brief, this property grouping "f" would simply combine with grouping "a."

interests in each property, but JV only has an interest in e1, therefore, e1 should be sold after e.

As a summary, the order of sale of the four (4) groupings encumbered by the first priority RE Loans mortgage should be sold as follows: a, c, e, and e1. This order of sale is the most beneficial for RE Loans, which gets all the proceeds of each sale unless and until it is fully satisfied. Pensco as the next priority lien holder is protected as long as possible to maximize its potential recovery on its encumbrances. Likewise, MF08 and JV are each protected to the maximum extent possible, reflecting their respective third and fourth priority positions.

Having now sold all of the property encumbered by the RE Loans mortgage (and assuming Pensco has not been satisfied) the next step is to order the sale of the remaining groupings encumbered by Pensco: d and d1. MF08, the next most senior lien remaining has an interest in each of those groupings, so it does not matter which is sold first. JV however, only has an interest in d1, so d should be sold before d1.

After having sold all of the property encumbered by Pensco, the remaining groupings are b and f, and each is only encumbered by one interest: MF08 and JV respectively. Therefore, there are no marshalling considerations for the sale of each grouping, and no difference whether one is sold before the other.<sup>5</sup>

According to the equitable marshalling doctrine, the properties subject to this action should be sold in the following order:<sup>6</sup>

---

<sup>5</sup> In fact, since both of these groups have only a single encumbrance they can actually be sold at any time independent of the sale of the other properties. They are only placed last to show their overall priority relationship to the other mortgages.

<sup>6</sup> Appendix B has this proposed order with each individual parcel identified and maintains the same order of sale of each of the individual parcels within each group from the Decree of Foreclosure. The Court will recall that in two of the groupings the parties agreed to modify the order of sale of the individual parcels to ensure that lots 1 and 2 were the last sold in their respective groupings and lots 159 and 163 were sold first within their respective groupings.



ORDER OF SALE ACCORDING TO EQUITABLE MARSHALLING DOCTRINE								
	First -----> Last							
	a	c	e	e1	d	d1	b	f
Oldest	RE	RE	RE	RE	-----	-----	-----	-----
↓	-----	-----	PEN	PEN	PEN	PEN	-----	-----
	-----	MF08	MF08	MF08	MF08	MF08	MF08	-----
Newest	JV	-----	-----	JV	-----	JV	-----	JV

Valiant’s proposed order of sale, which was ultimately included in the Decree of Foreclosure contained two errors that are corrected with the order provided above and more completely at Appendix B: First, Valiant proposed that properties not encumbered by the RE Loans mortgage be sold before all of the property encumbered by the RE Loans mortgage are sold (i.e. grouping “b” was listed as the second group to be sold in the Decree of Foreclosure, even though the RE Loans property had not been sold yet). This is incorrect because RE Loans is the first priority mortgage and should first be satisfied before other properties are sold.

The second error, and of most importance, is that Valiant’s order of sale did not accurately reflect the property encumbered by the JV mortgage and the effect that encumbrance has on the analysis of the inverse order of alienation rule. Correcting those errors, the property should be sold in the order presented above to equitably maximize the chance that each lien holder will recover the most value possible from the sales of these properties.

**B. The Court’s Determination that Parcel 121 is Only Encumbered by the JV LLC Mortgage is Not Supported by Sufficient and Competent Evidence**

The Court’s July 20, 2016, Judgment says “The JV Mortgage is a first priority mortgage, superior in right, title and interest to any interest claimed by another person or entity, with respect to Parcel 121 of the JV Property.” Judgment, ¶ 18. The July 20, 2016, Decree of Foreclosure also states that “JV has: (i) a secured first priority interest in and to Parcel 121 of the

JV Property,” Decree of Foreclosure, 6. Parcel 121 is described in Exhibit D to each as follows: “Lot 5, Block 2 of GOLDEN TEE ESTATES 4th ADDITION, according to the plat thereof, recorded in Book 8 of Plats, page 80, records of Bonner County, Idaho.” However, the Court lacks sufficient and competent evidence supporting this determination. In fact, the evidence before the Court is that RE Loans has a first priority mortgage on this property.

Valiant Idaho submitted a May 19, 2015, Declaration of C. Dean Shafer in Support of Valiant Idaho, LLC’s Motion for Entry of Final Judgment on May 20, 2015. That Declaration included an Exhibit 5 that “accurately describes the real property described in the Valiant Encumbrances, subtracting the parcels released from the Valiant Encumbrances, and which Valiant is entitled to foreclose.” Dec. C. Dean Shafer ¶ 4 (May 19, 2015). That exhibit contains the following legal description of real property “which Valiant is entitled to foreclose”:

**PARCEL 15:**

**Roads, Lots 1 and 6, Block 1; Lot 5, Block 2; Lot 1, Block 3; Lots 1, 2, 3, 4, 5, 6, 8 and 9, Block 4; Lots 1, 5, and 7, Block 5 of GOLDEN TEE ESTATES 4TH ADDITION, according to the plat thereof, recorded in Book 8 of Plats, page 80, records of Bonner County, Idaho.**

Dec. Shafer Ex. 5 (May 19, 2015)(emphasis added).

On August 19, 2015, Valiant submitted another Declaration of Mr. Shafer, entitled Declaration of C. Dean Shafer in Support of Valiant Idaho, LLC’s Motion to Alter, Amend and/or Reconsider Oder for Sale of Real Property. In that Declaration Mr. Shafer states “The 2007 RE Loans Mortgage encumbers the entire Legal Description and each and every lot/parcel within it.” Dec. C. Dean Shafer ¶ 9.a. (August 18, 2015).

Despite the declarations of Valiant’s expert that what is now described as “Parcel 121” is encumbered by the RE Loans mortgage, this Court’s July 20, 2015, Judgment and separate Decree of Foreclosure both describe that parcel as only being encumbered by the JV mortgage.

This holding is not supported by competent and sufficient evidence and should therefore be reconsidered.

**C. The Judgment and Decree of Foreclosure are Too Broad**

Idaho Code Section 6-101 dictates the effects of a foreclosure proceeding and the scope of a Judgment and Decree of Foreclosure. Idaho follows the "one action rule" that says "There can be but one action for the recovery of any debt, or the enforcement of any right secured by mortgage upon real estate." I.C. § 6-101(1). Valiant's foreclosure if its mortgages is the "one action." As written, the July 20, 2016, Judgment and separate Decree of Foreclosure exceeds the scope of a foreclosure action as dictated by Idaho Code § 6-101.

The outcome of a foreclosure action must "permit a secured creditor to realize upon collateral for a debt or other obligation agreed upon by the debtor and the creditor." I.C. § 6-101(2). Idaho Code § 6-101 also does not allow terminate unadjudicated and non-recorded equitable interests. *See W. Wood Investments, Inc. v. Acord*, 141 Idaho 75, 83, 106 P.3d 401, 409 (2005). Despite these restrictions on foreclosure actions, the Court's Decree of Foreclosure awards Valiant property not encumbered by the mortgages:

[E]ach Parcel of the Idaho Club Property that is sold at foreclosure sale shall include the property rights appurtenant to, located on or under, and existing in conjunction with said Parcel, including, but not limited to:

- a. **All easements, rights-of-way, water rights of every kind and nature...** and all other rights thereunto belonging or in any way appertaining to said Parcel either **at law or in equity**, in possession or in expectancy;
- b. **All fixtures, structures, buildings and improvements of every kind** and description located on or under said Parcel, including, but not limited to, all...utilities, fixed irrigation equipment and pumps, wells affixed tom attached to, placed upon, under or used **in any way in connection with the use, enjoyment, occupancy or operation of said Parcel or any portion thereof...**

Decree of Foreclosure, 5 (July 20, 2016). This statement is too broad because it fails to exclude rights in the real property that were never transferred to POBD and therefore, never encumbered by the RE Loans mortgage or any other Valiant mortgage.

On February 4, 2015, Defendants VP and NIR submitted the Declaration of Richard Vilelli in Opposition to Valiant Idaho, LLC's Motion for Summary Judgment Against JV, LLC, North Idaho Resorts, LLC, and VP, Incorporated. That Declaration included an Exhibit A, which is the Third Amended and Restated Real Property Purchase and Sale Agreement (hereinafter "PSA"), wherein the real property subject to this suit was sold to POBD's predecessor in interest (Pend Oreille Bonner Investments, Inc., hereinafter referred to as "POBD" for simplicity). Dec. Richard Vilelli ¶ 5 (February 4, 2015). The PSA specifically excluded interests in the Idaho Club real property that were reserved in favor of VP, Inc.:

As used herein, the term "Property" shall include: the Land; any improvements on or appurtenant to the Land; the items owned by Seller enumerated above; and all right, title and interest of Seller in and to all entitlements, easements, mineral rights, oil and gas rights, water, water rights **(excluding domestic water rights which are retained by sewer and water company V.P. Inc. including easements for operation and delivery of said domestic water and sewer service including sewer lagoon and land application.**

Dec. Vilelli ¶ 5, Ex. A, p. 2 (emphasis added). That PSA excluded domestic water rights, including easements, and the lagoon from the property and interests ultimately transferred to POBD. Since POBD never received these rights and interests, they could not have been encumbered by any of the Valiant mortgages. Therefore, the Decree of Foreclosure is too broad and should be modified to account for these unencumbered interests of VP.

**D. The Judgment and Decree of Foreclosure Need to be One Document**

The separate Judgment and Decree of Foreclosure entered by the Court on July 20, 2016, do not constitute a final judgment pursuant to Rule 54(a)(1). Rule 54(a)(1) defines a judgment and its required form as follows:

“Judgment” as used in these rules means a separate document entitled “Judgment” or “Decree”. A judgment **must state the relief to which a party is entitled on one or more claims for relief in the action, which may include dismissal with or without prejudice.**

(Emphasis added). Indeed, a judgment “must be a separate document that on its face states the relief granted or denied” and “the relief must be specific.” *Roesch v. Klemann*, 155 Idaho 175, 180, 307 P.3d 192, 197 (2013). A judgment also “represents a final determination of the rights of the parties.” *Spokane Structures, Inc. v. Equitable Inv., LLC*, 148 Idaho 616, 620, 226 P.3d 1263, 1267 (2010). The judgment must be a single document. *Cook v. Arias*, No. 41745, 2015 WL 4133726, at \*6 (Idaho Feb. 6, 2015). The judgment in a real property foreclosure action must “direct a sale of the incumbered property...and the application of the proceeds of the sale...” I.C. § 6-101(1).

This Court’s July 20, 2016, “Judgment” does not comply with Idaho Code Section 1-101 because it does not direct the sale of the real property or the application of the proceeds of the sale. Instead, it merely references “a decree of foreclosure that shall be separately entered by this Court.” Judgment, ¶¶ 15 and 23 (July 20, 2016). That Decree of Foreclosure directs the sale of the encumbered property and the application of the proceeds of the sale, but that direction is not contained in the “Judgment.” Moreover, the Judgment is not a “final determination of the rights of the parties” and does not “on its face state the relief granted.” Under the current state of affairs with multiple orders of sale, and a separate Decree of Foreclosure and Judgment there is

no one judgment which is appealable. I.A.R. 11. Therefore, the Court must enter a judgment that comports with Rule 54, I.A.R.11, and I.C. § 1-101(1).

**E. VP Joins in the Arguments Presented by JV, LLC**

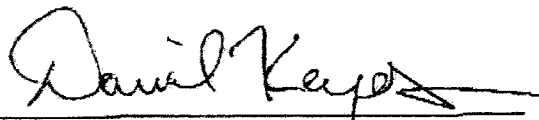
VP also joins and incorporates here by reference the arguments presented by JV, LLC in its Motion to Alter, Amend and Reconsider dated August 2, 2016.

**CONCLUSION**

For the reasons set forth above, JV respectfully requests the Court reconsider, alter, and amend its July 20, 2016, Judgment and separate Decree of Foreclosure.

DATED this 3<sup>rd</sup> day of August, 2016.

JAMES, VERNON & WEEKS, P.A.

By   
Daniel M. Keyes

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following persons in the manner indicated this 30 day of August, 2016:

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Facsimile: 208-263-8211

Gary A. Finney  
FINNEY FINNEY & FINNEY, PA  
120 E Lake St., Ste. 317  
Sandpoint, ID 83864

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Facsimile: 208-489-0110

Richard Stacey  
Jeff Sykes  
McConnell Wagner Sykes & Stacey, PLLC  
827 E. Park Blvd., Ste. 201  
Boise, ID 83712

Christina Elmore

**APPENDIX A**  
**Property Grouping According to Encumbrances**

Grouping	Mortgages Encumbering the Property	Specific Parcels Identified in the Exhibits to Judgment and Decree of Foreclosure
a	RE JV	1, 59, 62, 67, 91, 112, 113, and 163 <sup>7</sup>
b	MF08	33, and 37-40
c	RE MF08	32
d	Pensco MF08	29-31, and 34-35
d1	Pensco MF08 JV	66
e	RE Pensco MF08	5, 8-17, 19-28, and 36
e1	RE Pensco MF08 JV	2, 41-58, 60-61, 63-65, 68-90, 92-111, 114-120, 122-159 <sup>8</sup> , and 177 <sup>9</sup>
f	JV	121

<sup>7</sup> JV's mortgage only encumbers Tract 6 of this parcel.

<sup>8</sup> JV's mortgage only encumbers Tract 10-12 of Parcel 159.

<sup>9</sup> JV's mortgage only encumbers Tracts 5-11 of Parcel 177.

MEMORANDUM IN SUPPORT OF VP INC'S MOTION TO ALTER, AMEND, AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT: 19



**APPENDIX B**  
**Order of Sale Based Upon Inverse Order of Alienation**

- a. Parcels – 163, 59, 62, 67, 91, 112, 113, and 1 (RE Loans/JV Collateral);
- b. Parcel – 32 (RE Loans/MF08 Collateral);
- c. Parcels – 5, 8-17, 19-28, and 36 (RE Loans/Pensco/JV Collateral);
- d. Parcels – 159, 2, 41-58, 60-61, 63-65, 68-90, 92-111, 114-120, 122-156, 177, and 2 (RE Loans/Pensco/MF08/JV Collateral);
- e. Parcels – 5, 8-17, 19-28, and 36 (Pensco/MF08 Collateral);
- f. Parcel – 66 (Pensco/MF08/JV Collateral);
- g. Parcels – 33, 37, 38, 39, and 40 (MF08 Collateral\*); and
- h. Parcel – 121 (JV Collateral\*).

\* Since both of these groups have only a single encumbrance they can actually be sold at any time independent of the sale of the other properties. They are only placed last to show their overall priority relationship to the other mortgages.

STATE OF IDAHO  
COUNTY OF BONNER  
FIRST JUDICIAL DISTRICT

2016 AUG -4 PM 1:22

CLERK DISTRICT COURT

DEPUTY

IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT OF THE STATE OF  
IDAHO, IN AND FOR THE COUNTY OF BONNER

GENESIS GOLF BUILDERS, INC., formerly )  
known as NATIONAL GOLF BUILDERS, )  
INC., a Nevada corporation, )

CASE NO. CV-2009-0001810

Plaintiff, )

v. )

ORDER DENYING VP INC.'s )  
REQUEST FOR ORAL ARGUMENT )  
ON MOTION TO ALTER, )  
AMEND AND RECONSIDER )

PEND OREILLE BONNER DEVELOPMENT, )  
LLC, a Nevada limited liability company, *et al.*, )

Defendants. )

AND RELATED COUNTER, CROSS AND )  
THIRD PARTY ACTIONS PREVIOUSLY )  
FILED HEREIN )

On August 3, 2016, VP Inc. filed "*VP Inc.'s Motion to Alter, Amend and Reconsider the Decree of Foreclosure and Judgment.*"

Idaho Rule of Civil Procedure 7(b)(3)(F) provides: "If oral argument has been requested on any motion, the court may deny oral argument by written or oral notice from the court at least 1 day prior to the hearing. The court may limit oral argument at any time."

NOW, THEREFORE, as authorized by I.R.C.P. 7(b)(3)(F), IT IS HEREBY ORDERED THAT VP's request for oral argument is DENIED. If Valiant or JV wish to respond to any of the arguments in VP's motion, they may file an opposing memorandum within seven (7) days.

The Court will issue a written decision on VP's motion.

IT IS SO ORDERED.

DATED this 4<sup>th</sup> day of August, 2016.



---

**Barbara Buchanan**  
District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was delivered via facsimile transmission, this 4 day of August, 2016, to:

Gary A. Finney  
FINNEY FINNEY & FINNEY, PA  
120 East Lake Street, Suite 317  
Sandpoint, Idaho 83864  
**Facsimile: 208.263.8211**  
*(Attorneys for For J.V., LLC)*

Susan P. Weeks  
JAMES, VERNON & WEEKS, PA  
1626 Lincoln Way  
Coeur d'Alene, Idaho 83814  
**Facsimile: 208.664.1684**  
*(Attorneys for VP, Incorporated/North Idaho Resorts, LLC)*

Richard L. Stacey  
Jeff R. Sykes  
McCONNELL WAGNER SYKES  
& STACEY, PLLC.  
827 East Park Boulevard, Suite 201  
Boise, ID 83712  
**Facsimile: 208.489.0110**  
*(Attorney for R.E. Loans, LLC; and Valiant Idaho, LLC)*



---

Deputy Clerk

CLERK OF DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
BOISE, IDAHO 83725  
2016 AUG 17 10:37 AM  
DEPUTY

Richard L. Stacey, ISB #6800  
Jeff R. Sykes, ISB #5058  
Chad M. Nicholson, ISB #7506  
**McCONNELL WAGNER SYKES & STACEY PLLC**  
827 East Park Boulevard, Suite 201  
Boise, Idaho 83712  
Telephone: 208.489.0100  
Facsimile: 208.489.0110  
[stacey@mwslawyers.com](mailto:stacey@mwslawyers.com)  
[sykes@mwslawyers.com](mailto:sykes@mwslawyers.com)  
[nicholson@mwslawyers.com](mailto:nicholson@mwslawyers.com)

Attorneys For Valiant Idaho, LLC

**IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNER**

**GENESIS GOLF BUILDERS, INC.,**  
formerly known as  
**NATIONAL GOLF BUILDERS, INC.,**  
a Nevada corporation,

Plaintiff,

vs.

**PEND OREILLE BONNER  
DEVELOPMENT, LLC,**  
a Nevada limited liability company; *et al.*,

Defendants.

**AND RELATED COUNTER, CROSS  
AND THIRD PARTY ACTIONS  
PREVIOUSLY FILED HEREIN.**

Case No. CV-09-1810

**VALIANT IDAHO, LLC'S  
MEMORANDUM IN OPPOSITION TO  
VP, INC.'S MOTION FOR A NEW TRIAL**

**Honorable Barbara A. Buchanan**

**Hearing:**  
August 17, 2016 – 10:30 a.m. PDST

COMES NOW, Valiant Idaho, LLC ("Valiant"), by and through its attorneys of record, McConnell Wagner Sykes & Stacey PLLC, and files with this Court its Memorandum in Opposition to VP, Inc.'s Motion For A New Trial.

I.  
**INTRODUCTION**

Pursuant to Rules 59(a)(1)(A), (B), (D) and (E) of the Idaho Rules of Civil Procedure, VP, Inc. ("VP") moves the Court for a new trial on a single issue: The damage award made by the Court to Valiant against Pend Oreille Bonner Development, LLC ("POBD") relating to the operational expenses incurred by Valiant to maintain the Idaho Club Property and the cost incurred by Valiant to remediate the diesel fuel which leaked onto and under the Idaho Club Property. The Court added those damages to the RE Loans Note in accordance with the terms of the 2007 RE Loans Note. VP alleges that there were irregularities in the proceedings, a surprise and/or an abuse of discretion which prevented VP from having a fair trial. VP also argues there is new evidence which justifies a new trial. VP's motion for a new trial is without merit and should be denied.

II.  
**ARGUMENT**

The decision to grant a new trial is left to the sound discretion of the district court. The decision whether to deny a motion for new trial will not be overturned on appeal absent a manifest abuse of discretion. *Stout v. West*, 101 Idaho 533 (1984); *Myers v. A.D. Smith Harvest Store Prods. Inc.*, 114 Idaho 432 (Ct. App. 1988). To grant a new trial based upon surprise, there must be a showing of prejudice. *Hughes v. State Id. Dept. of Law*, 129 Idaho 558, 562 (1996).

As the Court will recall, the 2-day trial of this matter started on January 28, 2016. On January 29, 2016, the trial was recessed and continued until March 16, 2016. During the period between January 29 and March 2016, there was a diesel fuel leak on and under the Idaho Club Property, as testified to by William Haberman. Mr. Haberman testified that Valiant incurred substantial costs to protect the Idaho Club Property and to remediate the fuel spill. During that time, Valiant also realized that it had incurred significant costs to maintain the Idaho Club Property. Evidence of those costs were provided to VP and JV on March 14 and 15, 2016, before the trial re-started.

When the trial re-started, Mr. Haberman testified about the costs incurred by Valiant to remediate the Idaho Club Property; the reasons why remediation of the fuel spill was required; the reasons the claimed costs were incurred; and the amounts which were incurred. Mr. Haberman specifically testified that the amounts incurred were to protect the Idaho Club Property. VP did object to the testimony; however, VP's objection was overruled. VP did not cross-examine Mr. Haberman on any of these issues, although he was available and ready to testify on cross-examination.

Upon conclusion of the trial, the parties were ordered to submit closing arguments. In its closing brief, Valiant argued its entitlement to the costs incurred to maintain the Idaho Club Property and to remediate the diesel fuel spill. Valiant set forth the evidence upon which its entitlement was based, and the reasons why the amounts expended should be added to the RE Loans Note.

VP filed its closing argument on May 12, 2016 and, at paragraph five on Page 14, stated that the admission of the evidence concerning the fuel leak was prejudicial to VP and exceeded the scope of the issues to be decided at trial. VP made no argument concerning Valiant's request for the costs to maintain the property.

After considering the parties' closing arguments, the Court rejected VP's argument and awarded Valiant the costs to remediate the diesel fuel spill and the costs to maintain the Idaho Club Property.

VP's motion for a new trial should be denied.

**A. VP Presents The Court With No New Evidence.**

Rule 54 of the Idaho Rules of Civil Procedure requires that a party seeking a new trial based upon newly discovered evidence must provide the grounds and the evidence relied upon in an affidavit filed with the motion. I.R.C.P. 59(a)(2). The declaration submitted by VP in support of its motion for a new trial does not set forth any new evidence which would necessitate a new trial. VP only alleges at Paragraph 6 of the Declaration of Weeks in Support of VP Inc's [sic] Motion For New Trial that "[p]reliminary investigation into the diesel spill indicates it occurred on a lot owned by Andrew Goulder, which is not one of the lots which was the subject of this foreclosure. Further discovery from Valiant would be necessary to ascertain if this fact is correct." VP's statement as to its "preliminary investigation" is not new evidence; it is not evidence at all. VP does not state who performed the "preliminary investigation" or what was done as part of the "preliminary investigation". It has been months since the trial concluded and VP cannot point to any new evidence to support its motion for a new trial.

Moreover, where the fuel spill occurred (*i.e.*, on property neighboring the Idaho Club Property or on Idaho Club Property) is irrelevant. The 2007 RE Loans Mortgage allows Valiant to recover costs incurred to protect and maintain the Idaho Club Property. Plaintiff's Trial Ex. 1, pp. 15-16, ¶ 4.5. The uncontroverted testimony by Mr. Haberman was that the fuel spill impacted the Idaho Club Property and that Valiant was required to incur significant expenses to remediate the fuel spill and to protect the Idaho Club Property. VP offers no evidence that the remediation efforts were not required or unnecessary to protect the Idaho Club Property, or that the costs were not actually incurred.

**B. There Were No Irregularities In The Trial.**

VP asserts there was an irregularity in the trial proceedings which necessitate a new trial. VP's argument seems to be that the Court allowed evidence to be presented over its objection. Denial of an objection is not an irregularity in the proceedings contemplated by Rule 59 of the Idaho Rules of Civil Procedure. The fact that one party offers evidence, the other party objects to the offer and that party's objection is overruled is not irregular; to the contrary, it is commonplace. VP is simply complaining about the Court's decision to allow the evidence proffered by Valiant to be admitted. The Court's decision was not an abuse of discretion and not a basis for a new trial.

**C. There Was No "Surprise" At Trial.**

VP argues that it was "surprised" by the new evidence and a new trial should be granted. There was no surprise. The fact is that Valiant, as soon as it learned of the diesel fuel spill and the costs associated with the remediation, provided that information to VP before the trial reconvened. Attached to the Declaration of Jeff R. Sykes in Support of [Valiant's] Memorandum in Opposition to [VP's] Motion For A New Trial ("Sykes Dec.") are emails to Susan Weeks providing Plaintiff's



Trial Exhibits 110, 111 and 112 relating to the costs claimed by Valiant. VP did not request the deposition of Mr. Haberman or request any further discovery concerning either the cost of maintenance or the cost to remediate the diesel fuel spill. VP provides the Court with no basis or evidence which would establish that the outcome would change or that the costs claimed by Valiant are not recoverable.

**D. Valiant's Proof Was Within The Scope Of The Trial.**

Finally, VP asserts that Valiant's submission of the additional expenses that could be recovered under the 2007 RE Loans Note were outside the scope of the trial. VP's argument is not persuasive. The Court ordered that a trial be held on the issue of whether the RE Loans Note and/or Pensco Note had been satisfied at the closing of the MF08 Loan. The Court's ruling left Valiant in the position of having to prove the amounts owed under the RE Loans Note and the Pensco Note. Thus, Valiant presented evidence of the amounts owed under the RE Loans Note, including the maintenance costs and the costs to remediate the diesel fuel spill. The evidence was clearly within the scope of the Court's order.

**III.  
CONCLUSION**

Based upon the foregoing law and argument and the Court's record herein, Valiant respectfully requests the Court to deny VP's motion for a new trial.

////

////

////

DATED this 10<sup>th</sup> day of August 2016.

McCONNELL WAGNER SYKES & STACEY PLLC

BY:

  
Jeff R. Sykes  
Attorneys For Valiant Idaho, LLC

**CERTIFICATE OF SERVICE**

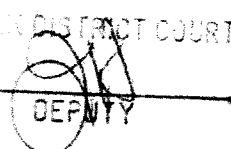
I HEREBY CERTIFY that on the 10<sup>th</sup> day of August 2016, a true and correct copy of the foregoing document was served by the method indicated below upon the following party(ies):

<p>Gary A. Finney, Esq. Finney Finney &amp; Finney, P.A. 120 East Lake Street, Suite 317 Sandpoint, Idaho 83864 Telephone: 208.263.7712 Facsimile: 208.263.8211 <i>Counsel For J.V., LLC</i></p>	<p>[ <input checked="" type="checkbox"/> ] U.S. Mail [ <input type="checkbox"/> ] Hand Delivered [ <input checked="" type="checkbox"/> ] Facsimile [ <input type="checkbox"/> ] Overnight Mail [ <input type="checkbox"/> ] Electronic Mail <a href="mailto:garyfinney@finneylaw.net">garyfinney@finneylaw.net</a></p>
<p>Susan P. Weeks, Esq. James, Vernon &amp; Weeks, PA 1626 Lincoln Way Coeur d'Alene, Idaho 83814 Telephone: 208.667.0683 Facsimile: 208.664.1684 <i>Counsel For VP Incorporated/North Idaho Resorts</i></p>	<p>[ <input checked="" type="checkbox"/> ] U.S. Mail [ <input type="checkbox"/> ] Hand Delivered [ <input checked="" type="checkbox"/> ] Facsimile [ <input type="checkbox"/> ] Overnight Mail [ <input type="checkbox"/> ] Electronic Mail <a href="mailto:sweeks@jvwlaw.net">sweeks@jvwlaw.net</a></p>

With two copies via U.S. Mail to:

Honorable Barbara A. Buchanan  
Judge of the First Judicial District  
Bonner County Courthouse  
215 South First Avenue  
Sandpoint, Idaho 83864

  
Jeff R. Sykes

CLERK OF DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
JAN 10 10 P 4 03  
CLERK DISTRICT COURT  
  
DEPUTY

Richard L. Stacey, ISB #6800  
Jeff R. Sykes, ISB #5058  
Chad M. Nicholson, ISB #7506  
**McCONNELL WAGNER SYKES & STACEY <sup>PLLC</sup>**  
827 East Park Boulevard, Suite 201  
Boise, Idaho 83712  
Telephone: 208.489.0100  
Facsimile: 208.489.0110  
[stacey@mwsslawyers.com](mailto:stacey@mwsslawyers.com)  
[sykes@mwsslawyers.com](mailto:sykes@mwsslawyers.com)  
[nicholson@mwsslawyers.com](mailto:nicholson@mwsslawyers.com)

Attorneys For Valiant Idaho, LLC

**IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNER**

**GENESIS GOLF BUILDERS, INC.,**  
formerly known as  
**NATIONAL GOLF BUILDERS, INC.,**  
a Nevada corporation,

Plaintiff,

vs.

**PEND OREILLE BONNER  
DEVELOPMENT, LLC,**  
a Nevada limited liability company; *et al.*,

Defendants.

Case No. CV-09-1810

**VALIANT IDAHO, LLC'S  
MEMORANDUM IN OPPOSITION TO  
JV, L.L.C.'S MOTION TO ALTER,  
AMEND AND RECONSIDER RE:  
(1) MEMORANDUM DECISION  
AND ORDER; (2) JUDGMENT;  
(3) DECREE OF FORECLOSURE;  
AND (4) ORDER OF SALE**

Honorable Barbara A. Buchanan

**AND RELATED COUNTER, CROSS  
AND THIRD PARTY ACTIONS  
PREVIOUSLY FILED HEREIN.**

COMES NOW, Valiant Idaho, LLC ("Valiant"), by and through its attorneys of record, McConnell Wagner Sykes & Stacey PLLC, and files with this Court its Memorandum in Opposition to JV, L.L.C.'s Motion To Alter, Amend and Reconsider Re: (1) Memorandum Decision and Order; (2) Judgment; (3) Decree of Foreclosure; and (4) Order of Sale.

I.

**INTRODUCTION**

On August 2, 2016, JV, L.L.C. ("JV") filed its Motion To Alter, Amend, and Reconsider Re: (1) Memorandum Decision and Order; (2) Judgment; (3) Decree of Foreclosure; (4) Order of Sale, and JV L.L.C.'s Memorandum in Support and Request For Hearing ("Motion to Reconsider"). On August 3, 2016, the Court entered an Order Denying JV, L.L.C.'s Request For Oral Argument and directed Valiant and/or VP, Inc. ("VP") and/or North Idaho Resorts, LLC to respond within seven days. The Court indicated it would issue a decision based upon written submissions of the parties. For the reasons set forth below, JV's Motion to Reconsider should be denied.

II.

**ARGUMENT**

JV's Motion to Reconsider is, to a large extent, simply JV's attempt to re-argue issues the Court has already considered and ruled on several times. As has been JV's practice in this case, JV continually asks the Court to reconsider its decisions (often multiple times) without presenting any new evidence or any new arguments to support JV's position. Such is the case with JV's instant Motion to Reconsider. JV's motion to Reconsider should be denied and Valiant should be awarded its attorneys' fees and costs for responding to JV's frivolous motion, as set forth below.

1. At Section II, p. 6, JV argues that the "Shea 3 seller/carry back first lien notes/deeds of trust 'paid' RE loan [sic] in full." JV argues that the Shea notes and deeds of trust paid-off the 2007 RE Loans Note in full. JV presents no evidence to support its proposition; whereas Valiant, at trial, proved that neither the 2007 RE Loans Note nor the Pensco Note were paid-off upon the closing of the MF08 Loan or at any other time. Valiant also proved the amounts owing under both Notes. This issue was determined by the Court in Valiant's favor based upon the evidence presented at trial. JV makes the same argument it made at trial and in its closing argument, but \presents the Court with no new evidence or arguments. JV's Motion to Reconsider is the text book definition of frivolous and made without a reasonable basis in law or fact.

2. At Section III, pp. 6-9, JV argues that its tax redemption deed is senior to the 2007 RE Loans Note and Mortgage, the Pensco Note and Mortgage and the MF08 Note and Mortgage. This was, of course, an issue that was briefed and argued on summary judgment and on motions for reconsideration, and was again argued by JV in its post-trial closing arguments. The Court ruled against JV on this issue each time. Now, in its Motion to Reconsider, JV *again* makes the same argument and *again* offers no evidence or argument to support its position. Again, JV's conduct is the text book definition of frivolous.

3. At Sections IV, V, VI, VII and VIII, pp. 9-14, JV argues that JV did not subordinate to the 2007 RE Loans Note and Mortgage; that Valiant did not account for monies in a "deposit account" which paid-off the 2007 RE Loans Note; that the MF08 Loan paid-off the RE Note and Pensco Note; that insurance proceeds from the fire at the clubhouse paid-off the RE Loans Note; and that JV's mortgage is prior/senior to Valiant's Mortgages. Each of these issues was addressed

on summary judgment and the Court ruled in Valiant's favor. Memorandum Decision and Order Re: 1) JV, LLC North Idaho Resorts, LLC, and VP, Incorporated's Motions to Reconsider; and 2) Valiant's Request For Entry of Proposed Final Judgment and Decree of Foreclosure and Sale entered July 21, 2015, ¶ G, p. 21. JV made the same argument in its closing argument after trial. The Court again ruled in favor of Valiant. Once more, JV offers no new evidence or arguments to support its Motion to Reconsider. JV's Motion to Reconsider is the text book definition of frivolous.

4. JV asserts that the final Judgment is incorrect because it does not contain the Decree of Foreclosure and order of sale. Like VP, Inc., JV cites no authority for the proposition. As set forth in Valiant's Memorandum in Opposition to VP, Inc.'s Motion To Alter, Amend and Reconsider the Decree of Foreclosure and Judgment, the judgment should only contain a plain statement of the relief to which a party is entitled. There is no law or rule that requires the notice of sale and decree of foreclosure to be contained within the judgment. The decree of foreclosure and order of sale are the mechanisms by which the relief provided in the judgment is effectuated. The Idaho Appellate Rules specifically allow the district court to retain jurisdiction to make additional rulings after the final judgment is entered. Under Rule 11(7) of the Idaho Appellate Rules, a party can appeal orders entered after an appeal is taken. The Judgment as entered and the Decree of Foreclosure as entered comply with the Idaho Rules of Civil Procedure and should not be changed.

5. Finally, at Section I, pp. 4-5, JV argues that Valiant's interest calculations are in error because it was not entitled to compound interest. JV's argument is wrong. Plaintiff's Trial Exhibits 2, 15 and 17 are the notes secured by the RE Loans Mortgage, Pensco Mortgage and the MF08 Mortgage. In each one of the Notes there is a provision that provides for compound interest. Each Note provides:

**COMPOUNDING:** Any interest or other charge which becomes due under this Note or the deed of trust, mortgage or security agreement securing this Note which remains due for more than one month shall accrue interest as of the date the interest or other charge was otherwise due at the same rate and upon the same terms as the principal under this Note.

The same provision is found in each Note. The interest calculation performed by Mr. Haberman was a calculation called for under the terms of each Note and he testified to that fact. JV makes an argument that only simple interest is allowed, but it provides the Court with absolutely no authority for the proposition.

### **III.** **CONCLUSION**

As is set forth above, JV's Motion to Reconsider is without any basis in law or fact, and is completely without merit. JV offers no new evidence or arguments to support any of its propositions. Many of JV's arguments are flatly against the record established at trial. Because JV's Motion to Reconsider is frivolous, Valiant should be awarded the attorneys' fees and costs necessary to respond to the frivolous motion.

McConnell Wagner Sykes + Stacey

Based upon the foregoing law and argument and the Court's record herein, Valiant respectfully requests the Court to *deny* JV's Motion to Reconsider.

DATED this 10<sup>th</sup> day of August 2016.

McCONNELL WAGNER SYKES & STACEY <sup>PLLC</sup>

BY:

  
Jeff R. Sykes  
Attorneys For Valiant Idaho, LLC



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10<sup>th</sup> day of August 2016, a true and correct copy of the foregoing document was served by the method indicated below upon the following party(ies):

Gary A. Finney, Esq. Finney Finney & Finney, P.A. 120 East Lake Street, Suite 317 Sandpoint, Idaho 83864 Telephone: 208.263.7712 Facsimile: 208.263.8211 <i>Counsel For J.V., LLC</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Electronic Mail <a href="mailto:garyfinney@finneylaw.net">garyfinney@finneylaw.net</a>
Susan P. Weeks, Esq. James, Vernon & Weeks, PA 1626 Lincoln Way Coeur d'Alene, Idaho 83814 Telephone: 208.667.0683 Facsimile: 208.664.1684 <i>Counsel For VP Incorporated/North Idaho Resorts</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Electronic Mail <a href="mailto:sweeks@jvwlaw.net">sweeks@jvwlaw.net</a>


With two copies via U.S. Mail to:

Honorable Barbara A. Buchanan  
Judge of the First Judicial District  
Bonner County Courthouse  
215 South First Avenue  
Sandpoint, Idaho 83864

  
Jeff R. Sykes

Richard L. Stacey, ISB #6800  
Jeff R. Sykes, ISB #5058  
Chad M. Nicholson, ISB #7506  
**McCONNELL WAGNER SYKES & STACEY PLLC**  
827 East Park Boulevard, Suite 201  
Boise, Idaho 83712  
Telephone: 208.489.0100  
Facsimile: 208.489.0110  
[stacey@mwsslawyers.com](mailto:stacey@mwsslawyers.com)  
[sykes@mwsslawyers.com](mailto:sykes@mwsslawyers.com)  
[nicholson@mwsslawyers.com](mailto:nicholson@mwsslawyers.com)

Attorneys For Valiant Idaho, LLC

CLERK OF DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
2016 AUG 10 P 4:27  
CLERK DISTRICT COURT  
  
DEPUTY

**IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNER**

**GENESIS GOLF BUILDERS, INC.,**  
formerly known as  
**NATIONAL GOLF BUILDERS, INC.,**  
a Nevada corporation,

Plaintiff,

vs.

**PEND OREILLE BONNER  
DEVELOPMENT, LLC,**  
a Nevada limited liability company; *et al.*,

Defendants.

**AND RELATED COUNTER, CROSS  
AND THIRD PARTY ACTIONS  
PREVIOUSLY FILED HEREIN.**

Case No. CV-09-1810

**DECLARATION OF  
RICHARD L. STACEY IN SUPPORT OF  
VALIANT IDAHO, LLC'S  
MEMORANDUM RESPONSES TO  
VP, INC.'S AND JV, L.L.C.'S  
OBJECTIONS AND  
MOTIONS TO DISALLOW  
MEMORANDUM OF COSTS  
AND ATTORNEYS' FEES**

**Honorable Barbara A. Buchanan**

**Hearing:  
August 17, 2016 – 10:30 a.m. PDST**

**DECLARATION OF RICHARD L. STACEY IN SUPPORT OF  
VALIANT IDAHO, LLC'S MEMORANDUM RESPONSES TO VP, INC.'S  
AND JV, L.L.C.'S OBJECTIONS AND MOTIONS TO DISALLOW  
MEMORANDUM OF COSTS AND ATTORNEYS' FEES | Page 1**

I:\1547.201\PLD\Post-Trial\AF&C-Stacey Dec 160810\_2.doc.docx

Pursuant to Rule 7(d) of the Idaho Rules of Civil Procedure and Idaho Code § 9-1406,

**Richard L. Stacey** declares as follows:

1. I am an attorney at law duly licensed to practice before this Court, and all Courts in the State of Idaho. I am a member in the law firm of McConnell Wagner Sykes & Stacey PLLC, attorneys for Valiant Idaho, LLC ("Valiant"). I make this Declaration in support of Valiant's (a) Memorandum a in Opposition to JV, L.L.C.'s Objection and Motion to Disallow Memorandum of Costs and Attorneys' Fees, and (b) Memorandum a in Opposition to JV, L.L.C.'s Objection and Motion to Disallow Memorandum of Costs and Attorneys' Fees filed concurrently and upon my personal knowledge.

2. Valiant spent a total of 3,196.1 hours and incurred a total of \$726,313.50 in reasonable attorneys' fees in this matter. Of those fees, 2,258 hours and \$523,991.50 were incurred in responding to the claims and defenses frivolously asserted by North Idaho Resorts, LLC ("NIR"), VP, Inc. ("VP"), and JV, L.L.C. ("JV") (collectively "Defendants").<sup>1/</sup>

3. I have reviewed the attorneys' fees set forth on Exhibit A and separated them into categories allocating the amounts Valiant incurred based on the specific work being performed and the particular Defendant or Defendants that necessitated each task. The amounts allocated to each said Defendant or Defendants is set forth on Exhibits B through D.

4. To the best of my knowledge and belief, the amounts attributable to each Defendant or Defendants were properly and fairly allocated.

---

<sup>1/</sup> Although NIR and JV are technically cross-claimants and VP is technically a third-party defendant, these parties will be collectively referred to as the "Defendants" for purposes of this declaration.

**DECLARATION OF RICHARD L. STACEY IN SUPPORT OF  
VALIANT IDAHO, LLC'S MEMORANDUM RESPONSES TO VP, INC.'S  
AND JV, L.L.C.'S OBJECTIONS AND MOTIONS TO DISALLOW  
MEMORANDUM OF COSTS AND ATTORNEYS' FEES | Page 2**

E:\1547.201\PLD\Post-Trial\AF&C-Stacey Dec 160810\_2.doc.docx

5. Exhibit A is a spreadsheet documenting all of the fees incurred by Valiant and identifies, by color, which fees were incurred responding to each Defendant's claims. The fees incurred have been identified and allocated as follows:

a. Highlighted in orange on Exhibit A are fees that are allocable exclusively to JV, which are unrelated to NIR and VP. The total fees allocable exclusively to JV amount to 282.5 hours for a total amount of \$68,863.50.

b. Highlighted in green on Exhibit A are fees that are allocable exclusively to NIR, which are unrelated to JV and VP. The total fees allocable exclusively to NIR amount to 28.9 hours for a total amount of \$6,081.00.

c. Highlighted in blue on Exhibit A are fees that are allocable exclusively to VP, which are unrelated to NIR and JV. The total fees allocable exclusively to VP amount to 171 hours for a total amount of \$39,594.50.

6. Several of the hours spent and fees incurred were on work related to two or more of the Defendants because, for example, Defendants' choice to file joint motions, hearings involved multiple parties, Defendants raised similar legal issues, *etc.* The fees that can be allocated to more than one Defendant have been identified and allocated as follows:

a. Highlighted in yellow on Exhibit A are fees that should be equally apportioned among NIR, VP and JV. These fees were incurred in drafting Valiant's three motions for summary judgment, preparing expert affidavits, attending joint hearings, *etc.* These fees amount to 749.80 hours for a total amount of \$168,666.00. If this amount is divided evenly among Defendants, each Defendant is responsible for \$56,222.00 of this total.

b. Highlighted in red on Exhibit A are fees that should be equally apportioned between NIR and JV. These fees were incurred for joint tasks prior to VP joining the suit. These fees amount to 15.7 hours for a total amount of \$3,297.00. If this amount is divided evenly between NIR and JV, NIR and JV are each responsible for \$1,648.50 of this total.

c. Highlighted in pink on Exhibit A are fees that should be equally apportioned between NIR and VP. These fees relate to the multiple joint pleadings and work related to the joint pleadings filed by NIR and VP. These fees amount to 206.7 hours for a total amount of \$44,932.00. If this amount is divided evenly between NIR and VP, NIR and VP are each responsible for \$22,466.00 of this total.

d. Highlighted in purple on Exhibit A are fees that should be equally apportioned between JV and VP. These fees were primarily incurred during the trial of this matter, of which NIR was not a part. These fees amount to 794.9 hours for a total amount of \$192,557.50. If this amount is divided evenly between JV and VP, JV and VP are each responsible for \$96,278.75 of this total.

7. The total fees attributable to JV are attached as Exhibit B. The total fees attributable to NIR are attached as Exhibit C. The total fees attributable to VP are attached as Exhibit D.

8. After apportioning the fees among Defendants, the total fees attributable to NIR, VP and JV are as follows:

<b>Total Fee's Owed by Each Defendant</b>			
<b>DEFENDANT</b>	<b>HOURS</b>	<b>% Attributed</b>	<b>AMOUNT</b>
JV, L.L.C.	282.5	100%	\$ 68,863.50
<u>Exhibit B</u>	15.7	50%	\$ 1,648.50
	794.9	50%	\$ 96,278.75
	749.8	33.3%	\$ 56,222.00
		<b>JV Total:</b>	<b>\$ 223,012.75</b>
North Idaho Resorts, LLC	28.9	100%	\$ 6,081.00
<u>Exhibit C</u>	206.7	50%	\$ 22,466.00
	15.7	50%	\$ 1,648.50
	749.8	33.3%	\$ 56,222.00
		<b>NIR Total:</b>	<b>\$ 86,417.50</b>
VP, Inc.	171.0	100%	\$ 39,594.50
<u>Exhibit D</u>	794.9	50%	\$ 96,278.75
	206.7	50%	\$ 22,466.00
	749.8	33.3%	\$ 56,222.00
		<b>VP Total:</b>	<b>\$ 214,561.25</b>

9. All of these fees were identified and set forth in attachments to Valiant's Memorandum of Costs and Attorneys' Fees ("Memorandum of Costs"). As set forth in the Memorandum of Costs, to the best of my knowledge and belief, the amount of the attorneys' fees, paralegal fees and costs identified hereinabove and itemized within Exhibits A-D are accurate and in compliance with Rule 54 of the Idaho Rules of Civil Procedure.

////

////

////


////

**DECLARATION OF RICHARD L. STACEY IN SUPPORT OF  
VALIANT IDAHO, LLC'S MEMORANDUM RESPONSES TO VP, INC.'S  
AND JV, L.L.C.'S OBJECTIONS AND MOTIONS TO DISALLOW  
MEMORANDUM OF COSTS AND ATTORNEYS' FEES | Page 5**

E:\1547.20\PLD\Post-Trial\AF&C-Stacey Dec 160810\_2.doc.docx

**I HEREBY CERTIFY AND DECLARE**, under penalty of perjury pursuant to the laws of the State of Idaho, that the foregoing is true and correct.

**DATED** this 10<sup>th</sup> day of August 2016.

  
\_\_\_\_\_  
RICHARD L. STACEY

**DECLARATION OF RICHARD L. STACEY IN SUPPORT OF VALIANT IDAHO, LLC'S MEMORANDUM RESPONSES TO VP, INC.'S AND JV, L.L.C.'S OBJECTIONS AND MOTIONS TO DISALLOW MEMORANDUM OF COSTS AND ATTORNEYS' FEES | Page 6**  
E:\1547.20\REPLD\Pout-Trial\AF&C-Stacey Dec 160810\_2.doc.docx

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10<sup>th</sup> day of August 2016, a true and correct copy of the foregoing document was served by the method indicated below upon the following party(ies):

Gary A. Finney, Esq. Finney Finney & Finney, P.A. 120 East Lake Street, Suite 317 Sandpoint, Idaho 83864 Telephone: 208.263.7712 Facsimile: 208.263.8211 <i>Counsel For J.V., LLC</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Electronic Mail <a href="mailto:garyfinney@finneylaw.net">garyfinney@finneylaw.net</a>
Susan P. Weeks, Esq. James, Vernon & Weeks, PA 1626 Lincoln Way Coeur d'Alene, Idaho 83814 Telephone: 208.667.0683 Facsimile: 208.664.1684 <i>Counsel For VP Incorporated/North Idaho Resorts</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Electronic Mail <a href="mailto:sweeks@jvwlaw.net">sweeks@jvwlaw.net</a>

With two copies via United States Mail to:

Honorable Barbara A. Buchanan  
Judge of the First Judicial District  
Bonner County Courthouse  
215 South First Avenue  
Sandpoint, Idaho 83864



Chad M. Nicholson

**DECLARATION OF RICHARD L. STACEY IN SUPPORT OF  
VALIANT IDAHO, LLC'S MEMORANDUM RESPONSES TO VP, INC.'S  
AND JV, L.L.C.'S OBJECTIONS AND MOTIONS TO DISALLOW  
MEMORANDUM OF COSTS AND ATTORNEYS' FEES | Page 7**

E:\1547.201\PLD\Post-Trial\AF&C-Stacey Dec 160810\_2.doc.docx



**EXHIBIT A  
GENESIS v. POBD  
Case No. CV 09-1810  
All Fees Incurred**

Trans Date	Atty	Rate	to Bill	Amount	
09/17/2010	15	\$140.00	1.1	\$154.00	Review and analyze complaint and mechanic's lien
09/20/2010	15	\$140.00	1.1	\$154.00	Research regarding registration and foreign corporation issues
09/22/2010	15	\$140.00	1.5	\$210.00	Draft budget
09/23/2010	15	\$140.00	1.3	\$182.00	Review and analyze new documents from Fidelity
09/24/2010	15	\$140.00	0.5	\$70.00	Phone conference with P. Ware regarding case status
09/24/2010	15	\$140.00	0.6	\$84.00	Review/analyze documents from P. Ware
09/27/2010	15	\$140.00	0.4	\$56.00	Draft substitution of counsel
09/27/2010	15	\$140.00	0.5	\$70.00	Begin drafting discovery
09/29/2010	15	\$140.00	0.8	\$112.00	Voicemail to and from L. Davis; voicemail to and from F. Elsaesser
09/30/2010	15	\$140.00	0.3	\$42.00	Multiple communications with F. Elsaesser
10/04/2010	15	\$140.00	0.5	\$70.00	Multiple communications with L. Davis regarding pleadings and case status
10/05/2010	15	\$140.00	0.7	\$98.00	Multiple communications with F. Elsaesser regarding his client's status
10/05/2010	15	\$140.00	0.2	\$28.00	Send e-mail to L. Davis regarding pleadings
10/18/2010	15	\$140.00	0.3	\$42.00	Review letter from P. Ware regarding coverage
10/20/2010	15	\$140.00	0.4	\$56.00	Follow up with L. Davis regarding pleadings and settlement status
10/20/2010	15	\$140.00	0.2	\$28.00	Leave voicemail for F. Elsaesser and send follow up email
10/20/2010	15	\$140.00	0.5	\$70.00	Review new pleadings from L. Davis
10/21/2010	15	\$140.00	0.4	\$56.00	Finish review of pleadings from L. Davis
10/21/2010	15	\$140.00	0.2	\$28.00	Review e-mail from L. Davis
10/22/2010	15	\$140.00	0.3	\$42.00	Respond to e-mail from Fidelity
11/01/2010	15	\$140.00	0.4	\$56.00	Contact Ford Elsaesser by phone and email
11/04/2010	15	\$140.00	0.5	\$70.00	Begin draft of answer
11/10/2010	15	\$140.00	1.9	\$266.00	Review proposal letter; review e-mail from P. Ware; review liens
11/11/2010	15	\$140.00	0.2	\$28.00	Follow up by voicemail to Ford Elsaesser
11/12/2010	15	\$140.00	0.4	\$56.00	Multiple communications with title company regarding other mechanic's liens encumbering property
11/16/2010	15	\$140.00	0.8	\$112.00	Multiple communications with P. Ware regarding proposed settlement from buyer
11/29/2010	15	\$140.00	0.9	\$126.00	Review and analyze new action naming R.E. Loans as defendant
12/13/2010	15	\$140.00	0.4	\$56.00	Phone conference with P. Ware regarding new lawsuit and Fidelity claims
12/13/2010	15	\$140.00	0.2	\$28.00	Review letter from Finney
12/13/2010	15	\$140.00	0.4	\$56.00	Review pleadings in new lawsuit
01/04/2011	3	\$250.00	0.3	\$75.00	Telephone conference with P. Ware, attorney for insured, regarding new suit filed and status
01/10/2011	3	\$250.00	0.1	\$25.00	E-mail to B. Coe
01/10/2011	3	\$250.00	0.3	\$75.00	Telephone conference with P. Ware, local counsel for R.E. Loans
01/13/2011	3	\$250.00	0.2	\$50.00	Telephone conference with L. Davis, counsel for Genesis Golf
01/13/2011	3	\$250.00	0.3	\$75.00	Review email and attachments from L. Davis
01/13/2011	3	\$250.00	0.2	\$50.00	E-mail to P. Ware
01/13/2011	3	\$250.00	0.2	\$50.00	Telephone conference with P. Ware
01/13/2011	3	\$250.00	0.3	\$75.00	Telephone conference with Alliance Title regarding condition of title and copies of documents
01/24/2011	3	\$250.00	0.3	\$75.00	Telephone conference with P. Ware regarding status of suits filed by Genesis, AIC and Sage Holdings
01/26/2011	3	\$250.00	0.3	\$75.00	Telephone conference with B. Coe
01/26/2011	3	\$250.00	0.3	\$75.00	Telephone conference with P. Ware
01/27/2011	3	\$250.00	2	\$500.00	Begin review of mortgages and liens filed against the project
01/31/2011	3	\$250.00	0.2	\$50.00	Telephone conference with B. Coe
01/31/2011	3	\$250.00	0.3	\$75.00	E-mails to Alliance regarding copies of lien and release for AIC
01/31/2011	3	\$250.00	0.2	\$50.00	E-mail to B. Coe with copies
01/31/2011	3	\$250.00	3.5	\$875.00	Review liens, mortgages, assignments, amendments and subordination agreements
02/01/2011	3	\$250.00	0.2	\$50.00	E-mail to P. Ware (counsel for R.E. Loans) with schedule of recorded documents
02/01/2011	3	\$250.00	0.2	\$50.00	E-mail to B. Coe with schedule of documents
02/03/2011	3	\$250.00	0.5	\$125.00	Review/analyze AIC cross claim to Genesis Golf Builders' complaint
02/03/2011	3	\$250.00	1	\$250.00	Draft/revise reply to cross claim
02/04/2011	3	\$250.00	0.5	\$125.00	Edit reply to cross claim
02/11/2011	3	\$250.00	0.2	\$50.00	Phone conference with B. Coe
04/11/2011	10	\$170.00	1.6	\$272.00	Analyze file documents regarding AIC
04/11/2011	10	\$170.00	0.6	\$102.00	Analyze litigation strategy
04/13/2011	10	\$170.00	0.6	\$102.00	Analyze claims by Genesis Golf
04/13/2011	10	\$170.00	0.6	\$102.00	Analyze file documents regarding Genesis
04/13/2011	10	\$170.00	0.6	\$102.00	Analyze and outline discovery issues
04/13/2011	10	\$170.00	0.4	\$68.00	Draft litigation outlines for Genesis issues
04/13/2011	10	\$170.00	0.5	\$102.00	Analyze and outline discovery issues
04/14/2011	10	\$170.00	1	\$170.00	Outline answer to Genesis Builders' complaint
04/14/2011	10	\$170.00	1.1	\$187.00	Analyze documents to answer and draft affirmative defense complaint
04/14/2011	10	\$170.00	0.8	\$136.00	Outline discovery to Genesis Builders
04/14/2011	10	\$170.00	1.4	\$238.00	Draft discovery to Genesis Builders
04/15/2011	10	\$170.00	1.3	\$221.00	Analyze/draft/edit answer to Genesis Builders' Complaint
04/15/2011	10	\$170.00	0.8	\$136.00	Analyze/edit/finalize answer
04/18/2011	10	\$170.00	1.5	\$272.00	Research and draft affirmative defenses
04/19/2011	10	\$170.00	2.1	\$357.00	Draft discovery to Genesis Builders

04/20/2011	10	\$170.00	0.6	\$102.00	Finalize discovery against Genesis Builders
04/20/2011	10	\$170.00	1.1	\$187.00	Outline/Research motion to consolidate
04/22/2011	19	\$110.00	5.1	\$561.00	Research regarding constructive trust
04/25/2011	19	\$110.00	2	\$220.00	Review/analyze mortgages, deeds of trusts, and other lien documents
04/25/2011	19	\$110.00	1.9	\$209.00	Research priority dates
04/26/2011	19	\$110.00	1.5	\$165.00	Research regarding agency
04/26/2011	10	\$170.00	0.2	\$34.00	Analyze email from client
04/26/2011	19	\$110.00	1.7	\$187.00	Draft memorandum regarding contract liability and liability via agency
04/26/2011	10	\$170.00	0.2	\$34.00	Analyze email from opposing counsel
04/26/2011	10	\$170.00	0.6	\$102.00	Analyze/draft/edit proposed scheduling order
04/26/2011	10	\$170.00	0.3	\$51.00	Draft notice of non-opposition to motion to withdraw filed by counsel for POBD
04/26/2011	10	\$170.00	1.6	\$272.00	Draft/analyze/edit motion to consolidate and supporting memorandum
04/27/2011	19	\$110.00	2	\$220.00	Draft memorandum regarding agency
04/27/2011	10	\$170.00	0.6	\$102.00	Draft/analyze affidavit in support of memorandum in support of motion to consolidate
04/27/2011	10	\$170.00	0.2	\$34.00	Draft/analyze motion to consolidate
04/27/2011	10	\$170.00	0.3	\$51.00	Analyze/edit memorandum in support of motion to consolidate
04/27/2011	19	\$110.00	4.1	\$451.00	Draft memorandum regarding contractual/statutory remedies
04/28/2011	19	\$110.00	3.5	\$385.00	Draft memorandum regarding statutory claim and lien release
04/28/2011	10	\$170.00	1.1	\$187.00	Finalize motion and memorandum in support of motion to consolidate
04/28/2011	10	\$170.00	0.5	\$85.00	Analyze third party complaint and cross claims filed by RC Worst
04/28/2011	10	\$170.00	0.3	\$51.00	Analyze letter from opposing counsel regarding motion to consolidate
04/28/2011	10	\$170.00	0.2	\$34.00	Telephone conference with client
04/29/2011	10	\$170.00	1	\$170.00	Finalize discovery to Genesis
04/29/2011	10	\$170.00	0.2	\$34.00	Analyze email from Fidelity regarding RC Worst claim
04/29/2011	10	\$170.00	1.1	\$187.00	Analyze documents regarding RC Worst claim
05/05/2011	19	\$110.00	3	\$330.00	Research regarding "undisclosed principal/apparent authority"
05/05/2011	19	\$110.00	0.7	\$77.00	Draft/revise memorandum regarding apparent authority, adequate remedies at law
05/06/2011	19	\$110.00	3.1	\$341.00	Research regarding constructive trusts and unjust enrichment
05/06/2011	19	\$110.00	2.5	\$275.00	Draft/revise memorandum regarding constructive trusts
05/09/2011	10	\$170.00	0.2	\$34.00	Analyze email from California counsel for R.E. Loans
05/09/2011	10	\$170.00	0.1	\$17.00	Email Idaho counsel for R.E. Loans regarding contact person to discuss discovery responses
05/09/2011	10	\$170.00	0.3	\$51.00	Analyze litigation issues
05/09/2011	10	\$170.00	0.2	\$34.00	Leave voicemail with Fidelity; email to Fidelity re same
05/10/2011	10	\$170.00	0.2	\$34.00	Telephone conference with Fidelity
05/11/2011	3	\$250.00	0.4	\$100.00	Telephone conference with P. Ware, local counsel for RE loans
05/12/2011	19	\$110.00	0.4	\$44.00	Analyze consolidation pleadings
05/13/2011	19	\$110.00	1.7	\$187.00	Research regarding consolidation and equitable subrogation
05/13/2011	19	\$110.00	0.7	\$77.00	Review/analyze pleadings in all three cases
05/13/2011	19	\$110.00	2.4	\$264.00	Draft/revise reply to consolidation objection
05/13/2011	19	\$110.00	1.8	\$198.00	Draft memorandum regarding equitable subrogation
05/16/2011	19	\$110.00	0.8	\$88.00	Research regarding "unnecessary costs" of consolidation
05/16/2011	19	\$110.00	0.4	\$44.00	Revise reply to objection regarding consolidation
05/17/2011	10	\$170.00	1.4	\$238.00	Analyze documents from client
05/17/2011	10	\$170.00	0.5	\$85.00	Analyze proposed confidentiality agreement and email counsel regarding the same
05/17/2011	10	\$170.00	0.3	\$51.00	Analyze proposed changes to confidentiality agreement
05/17/2011	10	\$170.00	0.3	\$51.00	Prepare argument in support of motion to consolidate
05/18/2011	3	\$250.00	1.5	\$375.00	Review memo in support of motion to consolidate, memo in opposition and reply memo in preparation of hearing on motion to consolidate
05/18/2011	3	\$250.00	0.5	\$125.00	Review recorded lien documents and subordinations
05/18/2011	3	\$250.00	0.8	\$200.00	Appear telephonic hearing on motion to consolidate
05/20/2011	19	\$110.00	0.4	\$44.00	Teleconference with K. Ng (x2); teleconference with J. Finney
05/23/2011	10	\$170.00	0.4	\$68.00	Analyze email from opposing counsel and reply to same
05/25/2011	10	\$170.00	1.2	\$204.00	Analyze client documents
05/26/2011	10	\$170.00	0.3	\$51.00	Analyze Motion to Withdraw from counsel for POBD
06/01/2011	6	\$210.00	3.2	\$672.00	Prepare answer to Worst cross-claim
06/02/2011	6	\$210.00	4.4	\$924.00	Prepare interrogatories and requests for production to RC Worst Company, Inc.
06/03/2011	6	\$210.00	1.2	\$252.00	Final discovery requests to RC Worst Company, Inc.
06/07/2011	10	\$170.00	0.4	\$68.00	Emails (2) to P. Ware
06/07/2011	10	\$170.00	0.2	\$34.00	Telephone conference with P. Ware regarding liens and mortgages
06/07/2011	10	\$170.00	1.3	\$221.00	Analyze R.E. Loan documents
06/07/2011	10	\$170.00	0.3	\$136.00	Analyze/amend discovery to ACI
06/08/2011	10	\$170.00	0.6	\$102.00	Analyze/edit discovery to ACI
06/09/2011	10	\$170.00	0.6	\$102.00	Finalize discovery to ACI
06/09/2011	10	\$170.00	2	\$340.00	Analyze documents from title company
06/22/2011	10	\$170.00	0.3	\$136.00	Analyze proposed stipulation regarding claims of Wells Fargo; email counsel for Wells Fargo regarding the same; analyze voicemail from opposing counsel; telephone conference with opposing counsel regarding the same; draft proposed changes to same
06/23/2011	10	\$170.00	1.3	\$306.00	Analyze documents recorded against the Idaho Club Property
06/28/2011	6	\$210.00	0.3	\$63.00	Correspond with C. Dodson regarding discovery responses
06/29/2011	10	\$170.00	1	\$170.00	Analyze ACI liens
06/29/2011	10	\$170.00	2.2	\$374.00	Research caselaw regarding requirement to serve liens
06/30/2011	10	\$170.00	1	\$170.00	Analyze RC Worst lien
06/30/2011	10	\$170.00	1.6	\$272.00	Research lien priority issues
07/06/2011	10	\$170.00	2.7	\$459.00	Analyze liens, endorsements of payments on accounts; lis pendens; lien releases, mortgages and other documents recorded against the Idaho Club Project
07/06/2011	10	\$170.00	1.4	\$238.00	Draft memorandum regarding analysis of liens, endorsements of payments on accounts; lis pendens; lien releases, mortgages and

					other documents recorded against the Idaho Club Project
07/06/2011	5	\$210.00	1.1	\$231.00	Confer with R. Stacey regarding lien validity; study lien
07/13/2011	10	\$170.00	0.3	\$51.00	Telephone conference with J. Finney regarding outstanding discovery responses from Genesis and ACI
08/03/2011	5	\$210.00	0.3	\$63.00	Correspondence to C. Dodson regarding defendant's claim
08/16/2011	10	\$170.00	0.4	\$68.00	Telephone conference with J. Finney (2) regarding propriety of Finney contacting R.E. Loans Officer directly; telephone conference with R.E. Loans regarding the same
08/23/2011	10	\$170.00	0.2	\$34.00	Analyze pleadings filed by B. Ng to set aside default
08/23/2011	10	\$170.00	0.4	\$68.00	Draft letter to Mr. Ng requesting agreement to service by email and identifying error in hearing date
08/23/2011	10	\$170.00	0.3	\$51.00	Analyze/draft email to opposing counsel for R. Worst requiring service of outstanding discovery or R.E. Loans will file a motion to compel
08/23/2011	10	\$170.00	0.9	\$153.00	Analyze property records relating to April 15, 2008 partial release of Mortgage
08/23/2011	10	\$170.00	0.2	\$34.00	Email client regarding partial release of mortgage
08/24/2011	10	\$170.00	0.2	\$34.00	Analyze email response from client
08/24/2011	10	\$170.00	0.6	\$102.00	Analyze property records
08/24/2011	10	\$170.00	0.2	\$34.00	Email title company regarding Parcel 21
08/24/2011	10	\$170.00	0.4	\$68.00	Analyze colonized plats from title company
08/30/2011	10	\$170.00	0.1	\$17.00	Analyze email from opposing counsel for Mortgage Fund 08 regarding stipulation as to Wells Fargo
08/30/2011	10	\$170.00	0.4	\$68.00	Analyze draft stipulation and proposed changes from ACI counsel attached to same
08/30/2011	10	\$170.00	0.1	\$17.00	Leave voicemail regarding objections to draft stipulation
08/30/2011	10	\$170.00	0.3	\$51.00	Analyze project documents
08/30/2011	10	\$170.00	0.4	\$68.00	Email client regarding project documents
08/31/2011	10	\$170.00	0.1	\$17.00	Analyze voicemail from counsel for Wells Fargo
08/31/2011	10	\$170.00	0.2	\$34.00	Analyze draft new stipulation
08/31/2011	10	\$170.00	0.1	\$17.00	Leave voicemail for said counsel outlining additional objections to stipulation
09/01/2011	10	\$170.00	0.3	\$51.00	Telephone conference with P. Ware regarding discovery issues with ACI and objections to Wells Fargo stipulation
09/01/2011	10	\$170.00	1.8	\$306.00	Analyze needed discovery; analyze real property records; confer with client
09/07/2011	10	\$170.00	1	\$170.00	Analyze emails (3) and attachments (16) from client
09/07/2011	10	\$170.00	0.8	\$136.00	Analyze RC Worst interrogatory answers and responses to requests for production of documents
09/07/2011	10	\$170.00	0.6	\$102.00	Outline deficiencies in RC Worst interrogatory answers and responses to requests for production of documents
09/07/2011	10	\$170.00	0.4	\$68.00	Telephone conference with opposing counsel regarding deficiencies in RC Worst answers to interrogatories and responses to requests for production of documents, schedule time to copy the records in support of same, and discuss litigation documents companies in Coeur d'Alene
09/09/2011	10	\$170.00	0.1	\$17.00	Analyze voicemail from opposing counsel
09/09/2011	10	\$170.00	0.1	\$17.00	Leave voicemail for counsel for Genesis regarding outstanding discovery responses
09/09/2011	10	\$170.00	0.1	\$17.00	Leave voicemail for counsel for RC Worst regarding deficiencies in discovery responses
09/13/2011	10	\$170.00	0.4	\$68.00	Analyze/outline RC Worst discovery discrepancies
09/13/2011	10	\$170.00	0.1	\$17.00	Telephone conference (leave voicemail) with counsel for RC Worst regarding deficiencies in discovery responses
09/13/2011	10	\$170.00	0.1	\$17.00	Telephone conference (leave voicemail) with counsel for Genesis Builders regarding outstanding discovery responses
09/13/2011	10	\$170.00	1.9	\$323.00	Draft/analyze/edit motion to compel ACI discovery responses to R.E. Loans' discovery and affidavit in support of same
09/14/2011	10	\$170.00	1.6	\$272.00	Analyze/edit/finalize memorandum in support of motion to compel ACI interrogatory responses; draft/analyze email to L. Davis re outstanding discovery responses; analyze letter from J. Finney attaching ACI responses to document requests
09/15/2011	10	\$170.00	1.9	\$323.00	Analyze/draft/finalize motion to compel Genesis discovery responses
09/15/2011	10	\$170.00	0.7	\$119.00	Analyze/outline discrepancies in RC Worst discovery responses
09/15/2011	10	\$170.00	0.5	\$85.00	Analyze/outline/draft letter to RC Worst's counsel outlining discovery discrepancies
09/19/2011	10	\$170.00	0.1	\$17.00	Analyze email from opposing counsel regarding alleged bankruptcy of R.E. Loans
09/19/2011	10	\$170.00	0.7	\$119.00	Analyze bankruptcy petition and letters attached thereto
09/19/2011	10	\$170.00	0.4	\$68.00	Analyze impact of bankruptcy on litigation
09/19/2011	10	\$170.00	3.5	\$102.00	Analyze/draft/finalize letter to counsel for RC Worst outlining deficiencies in its discovery responses and requesting supplementation
09/20/2011	10	\$170.00	0.3	\$51.00	Finalize letter to counsel for RC Worst regarding supplementation of discovery responses
09/26/2011	10	\$170.00	0.3	\$51.00	Email client regarding alleged bankruptcy filing; analyze reply to same
09/29/2011	19	\$110.00	2.2	\$242.00	Research whether a defendant/bankrupt's motion to compel is stayed by the automatic stay
09/29/2011	10	\$170.00	0.8	\$136.00	Analyze pleadings filed by ACI regarding notifying of bankruptcy filing; analyze objection to motion to set aside default
09/30/2011	19	\$110.00	0.5	\$66.00	Analyze complaint, answer, first set of discovery, motion to compel in preparation for hearing on motion to compel
09/30/2011	10	\$170.00	0.1	\$17.00	Analyze voicemail from counsel for client and return call to same
10/03/2011	10	\$170.00	0.2	\$34.00	Analyze order staying proceedings due to bankruptcy
10/03/2011	10	\$170.00	1.4	\$238.00	Legal research regarding manner of lifting bankruptcy stay
10/04/2011	10	\$170.00	0.3	\$51.00	Analyze pleadings filed by ACI
10/04/2011	10	\$170.00	0.2	\$34.00	Analyze letter from C. Dodson regarding R.C. Worst discovery

					documents
10/04/2011	10	\$170.00	0.2	\$34.00	Analyze administrative order reassigning R.E. Loans cases
10/04/2011	10	\$170.00	0.8	\$136.00	Analyze supplemental discovery responses from R.C. Worst
10/04/2011	10	\$170.00	2.6	\$442.00	Analyze project documents produced by R.C. Worst
10/10/2011	10	\$170.00	0.2	\$34.00	Analyze motion to disqualify
10/10/2011	10	\$170.00	0.3	\$51.00	Telephone conference with Fidelity regarding status of case and affect of bankruptcy filing
10/11/2011	10	\$170.00	0.2	\$34.00	Telephone conference with client regarding status of case
10/12/2011	10	\$170.00	0.3	\$51.00	Telephone conference with R.E. Loans regarding status of bankruptcy and status of litigation
10/12/2011	10	\$170.00	0.3	\$51.00	Telephone conference with in house counsel for R.E. Loans regarding bankruptcy filing, status of motion to lift stay, and current status of Idaho Club litigation
10/12/2011	10	\$170.00	0.2	\$34.00	Analyze email from client
10/13/2011	10	\$170.00	0.2	\$34.00	Telephone conference with P. Ware
10/13/2011	10	\$170.00	0.2	\$34.00	Analyze letter from J. Finney
10/18/2011	10	\$170.00	0.4	\$68.00	Telephone conference with client
10/19/2011	10	\$170.00	1.2	\$204.00	Draft outline of facts and events
10/20/2011	10	\$170.00	0.6	\$102.00	Telephone conference with client regarding status
10/21/2011	10	\$170.00	1.8	\$306.00	Analyze bankruptcy rules and Idaho law regarding nonjudicial foreclosure of a mortgage during bankruptcy
10/21/2011	10	\$170.00	0.3	\$51.00	Telephone conference with client regarding same
10/26/2011	15	\$140.00	0.8	\$112.00	Conference with R. Stacey regarding nonjudicial foreclosure; document review
10/27/2011	15	\$140.00	3.9	\$546.00	Review documents and pleadings
10/27/2011	11	\$170.00	3.2	\$544.00	Research bankruptcy stay and foreclosure defense
10/28/2011	15	\$140.00	0.5	\$70.00	Conference with R. Stacey; review pleadings
10/28/2011	11	\$170.00	2.3	\$476.00	Draft memorandum re bankruptcy stay
10/31/2011	15	\$140.00	1.5	\$210.00	Research nonjudicial foreclosure
11/01/2011	10	\$170.00	2.1	\$357.00	Analyze RC Worst documents
11/02/2011	10	\$170.00	0.4	\$68.00	Email client regarding nonjudicial foreclosure
11/02/2011	10	\$170.00	0.1	\$17.00	Analyze client's response
11/02/2011	10	\$170.00	0.1	\$17.00	Email client regarding coordinating conference call
11/03/2011	10	\$170.00	0.6	\$102.00	Analyze Idaho law rules governing foreclosure of mortgages
11/03/2011	10	\$170.00	0.5	\$85.00	Prepare for conference call with client
11/03/2011	10	\$170.00	0.8	\$136.00	Participate in conference call with client
11/04/2011	10	\$170.00	0.2	\$34.00	Telephone conference with client
11/04/2011	10	\$170.00	0.1	\$17.00	Confer with title company
11/04/2011	10	\$170.00	0.3	\$51.00	Analyze tax liens
11/04/2011	10	\$170.00	0.2	\$34.00	Correspondence with tax assessor notifying of bankruptcy stay
11/05/2011	10	\$170.00	0.2	\$34.00	Analyze pleading from B. Ng
11/14/2011	10	\$170.00	0.1	\$17.00	Analyze voicemail from B. Ng
11/14/2011	10	\$170.00	0.2	\$34.00	Telephone conference with B. Ng regarding motion to set aside and failure to receive service of same
11/14/2011	10	\$170.00	0.1	\$17.00	Analyze amended pleadings filed by B. Ng
11/21/2011	10	\$170.00	0.8	\$136.00	Prepare for and attend hearing on Motion to Set Aside filed by B. Ng
11/28/2011	10	\$170.00	0.2	\$34.00	Analyze pleading filed by B. Ng
11/29/2011	10	\$170.00	0.2	\$34.00	Analyze pleadings files by B. Ng
12/05/2011	10	\$170.00	0.5	\$85.00	Analyze supplemental motion to set aside default; analyze amended notice of hearing on motion to withdraw
12/05/2011	10	\$170.00	0.3	\$51.00	Analyze emails (2) from client and respond to same
12/06/2011	10	\$170.00	0.5	\$85.00	Plan and prepare for conference with R.E. Loans
12/06/2011	10	\$170.00	0.3	\$51.00	Confer
12/06/2011	10	\$170.00	0.3	\$51.00	Analyze email from Fidelity regarding status
12/15/2011	15	\$140.00	1.3	\$182.00	Prepare for and attend hearing
12/29/2011	15	\$140.00	2.6	\$364.00	Review/analyze documents regarding casemap
12/29/2011	19	\$110.00	0.5	\$66.00	Attend telephonic hearing regarding motion to withdraw; conference with R. Stacey regarding the same
01/03/2012	15	\$140.00	4.9	\$686.00	Lien analysis; review and organize documents
01/04/2012	15	\$140.00	5.7	\$798.00	Continue lien analysis; review and organize documents
01/05/2012	15	\$140.00	2.9	\$406.00	Draft lien analysis; review and organize documents
01/06/2012	15	\$140.00	4.3	\$602.00	Revise lien analysis; review and organize documents and facts into Casemap
01/06/2012	10	\$170.00	0.7	\$119.00	Analyze RC Worst and Sage Holdings documents
01/06/2012	10	\$170.00	0.9	\$153.00	Draft outline of deficiencies in documents
01/09/2012	10	\$170.00	0.3	\$51.00	Analyze email from client and respond to same
01/09/2012	10	\$170.00	0.2	\$34.00	Email Fidelity regarding memorandum regarding priority
01/09/2012	10	\$170.00	0.2	\$34.00	Analyze email from client and reply to same
01/09/2012	10	\$170.00	0.3	\$51.00	Analyze letter from opposing counsel regarding withdrawal of counsel for Genesis
01/13/2012	10	\$170.00	2.2	\$374.00	Analyze project records and prepare for conference call with R.E. Loans; participate in conference call
01/16/2012	15	\$140.00	0.6	\$84.00	Litigation guaranty research; review order setting aside default
01/17/2012	15	\$140.00	0.5	\$70.00	Multiple communications with R. Laws at Sandpoint Title
01/18/2012	10	\$170.00	0.3	\$51.00	Analyze email from title company and email client regarding the same
01/19/2012	15	\$140.00	4.2	\$588.00	Review legal descriptions; multiple communications with R. Laws; research and update status memorandum
01/19/2012	10	\$170.00	0.3	\$51.00	Email client regarding loan; analyze response; email client
01/19/2012	10	\$170.00	0.2	\$34.00	Telephone conference with Fidelity regarding status of case
01/19/2012	10	\$170.00	0.2	\$34.00	Telephone conference with title company regarding title report
01/23/2012	15	\$140.00	0.5	\$70.00	Multiple communications with R. Laws
01/23/2012	10	\$170.00	0.5	\$85.00	Email client regarding status of bankruptcy stay; analyze response; reply to same
01/20/2012	10	\$170.00	0.3	\$51.00	Analyze email from client; respond to same
01/20/2012	10	\$170.00	0.4	\$68.00	Analyze email from bankruptcy counsel and analyze/reply to same

01/23/2012	10	\$170.00	0.6	\$102.00	Analyze Wells Fargo's motion to dismiss based upon Genesis' failure to obtain new counsel
01/27/2012	10	\$170.00	0.9	\$153.00	Analyze client documents and confer with client regarding same
01/27/2012	10	\$170.00	0.9	\$153.00	Draft memorandum to R.E. Loans
01/27/2012	10	\$170.00	0.2	\$34.00	Analyze emails from Fidelity
01/27/2012	10	\$170.00	0.2	\$34.00	Analyze/draft response to Fidelity emails
01/27/2012	10	\$170.00	0.2	\$34.00	Email client regarding title report
01/27/2012	10	\$170.00	0.2	\$34.00	Analyze response to client's email title report
01/27/2012	15	\$140.00	2.3	\$322.00	Revise analysis; multiple communications with client; review documents
01/30/2012	10	\$170.00	0.2	\$34.00	Analyze email from client
01/31/2012	10	\$170.00	0.3	\$51.00	Analyze email from client and reply to same
02/06/2012	15	\$140.00	4.9	\$686.00	Research apportionment
02/06/2012	15	\$140.00	0.5	\$70.00	Phone conference with R. Laws
02/08/2012	10	\$170.00	0.3	\$51.00	Analyze email from client and respond to same
02/08/2012	10	\$170.00	0.2	\$34.00	Analyze stipulation entered by Court regarding Wells Fargo Capital Finance
02/08/2012	15	\$140.00	1.1	\$154.00	Review legal descriptions and litigation guarantee information
02/10/2012	10	\$170.00	0.3	\$51.00	Analyze email from client and respond to same
02/14/2012	10	\$170.00	0.3	\$51.00	Confer with counsel for R.E. Loans regarding status of bankruptcy
02/21/2012	10	\$170.00	0.3	\$51.00	Telephone conference with J. Holley regarding status of case
03/02/2012	10	\$170.00	0.3	\$51.00	Telephone conference with opposing counsel regarding status of bankruptcy stay and whether R.E. Loans intends to file a motion to lift the stay
03/02/2012	10	\$170.00	0.3	\$51.00	Telephone conference with R. Dishnica regarding R.E. Loans' correspondence with Bar-K
03/02/2012	10	\$170.00	0.8	\$136.00	Analyze client documents and forward same to R. Dishnica
03/06/2012	10	\$170.00	1.2	\$204.00	Analyze pleadings forwarded by client
03/06/2012	10	\$170.00	0.4	\$68.00	Telephone conference with client
03/06/2012	15	\$190.00	1.1	\$209.00	Review and revise Motion for Relief from Stay
03/12/2012	10	\$250.00	0.3	\$75.00	Analyze emails from CA counsel and confer with A. Eberlin regarding the same
03/12/2012	15	\$190.00	1.5	\$285.00	Revise motion for stay relief
03/13/2012	15	\$190.00	0.4	\$76.00	Revise motion for stay relief
03/14/2012	10	\$250.00	2.6	\$650.00	Analyze/edit/draft changes to the memorandum in support of motion to lift stay; confer with A. Eberlin regarding the same; analyze email from R. Dishnica and respond to same
03/14/2012	15	\$190.00	4.2	\$798.00	Revise bankruptcy motion for stay relief; research regarding tax deeds and bankruptcy
03/15/2012	10	\$250.00	1.4	\$350.00	Prepare for conference call; participate in conference call with R. Dishnica and J. Holley; conference call with A. Eberlin and E. Karasik; analyze draft letter to Bonner County and confer with A. Eberlin re same; email R. Dishnica regarding the same
03/15/2012	15	\$190.00	2.9	\$551.00	Research regarding tax deeds and bankruptcy; draft letter to treasurer of Bonner County
03/16/2012	10	\$250.00	0.3	\$75.00	Confer with A. Eberlin regarding final draft of letter
03/16/2012	15	\$190.00	1.4	\$266.00	Finalize letter to Bonner County treasurer
03/16/2012	15	\$190.00	0.3	\$57.00	Multiple communications with R. Laws of Sandpoint Title
03/16/2012	15	\$190.00	0.5	\$95.00	Review changes to motion for relief from stay
03/19/2012	10	\$250.00	0.4	\$100.00	Analyze letter from Bonner County; confer with J. Dykstra regarding the same; analyze email from R. Dishnica and reply to same
03/19/2012	15	\$190.00	1.2	\$228.00	Review letter from Bonner County and research authority cited therein
03/19/2012	10	\$170.00	0.6	\$102.00	Analyze letter from Bonner County regarding tax lien issues
03/19/2012	10	\$170.00	0.3	\$51.00	Confer with client regarding Bonner County tax lien issues
03/20/2012	10	\$250.00	2.2	\$550.00	Analyze caselaw cited by Bonner County and confer with A. Eberlin regarding the same; prepare for and attend conference call with R. Dishnica and J. Holley; confer with A. Eberlin re same; analyze caselaw
03/20/2012	15	\$190.00	3.1	\$589.00	Research and draft letter to Bonner County; phone conference with client
03/21/2012	10	\$250.00	0.7	\$175.00	Analyze/edit motion to lift stay and confer with A. Eberlin regarding the same; email E. Karasik regarding the same; analyze order from Bankruptcy court
03/21/2012	15	\$190.00	0.9	\$171.00	Review new authority from co-counsel; revise letter to Bonner County
03/21/2012	15	\$190.00	0.5	\$95.00	Review latest draft of motion for relief from stay
03/21/2012	15	\$190.00	0.2	\$38.00	Multiple communications with E. Karasik regarding motion for relief from stay
03/22/2012	10	\$250.00	1.1	\$275.00	Analyze research in support of response to Bonner County; analyze draft letter to Bonner County; confer with A. Eberlin regarding the same; analyze emails from E. Karasik regarding the same
03/22/2012	15	\$190.00	1.6	\$304.00	Revise letter with authority regarding BR section 105; finalize and send letter to Bonner County; review letter from Bonner County in response
03/23/2012	15	\$190.00	2.1	\$399.00	Analyze letter from Bonner County; multiple communications with G. Edson; research tax deed process
03/23/2012	10	\$250.00	0.6	\$150.00	Analyze email/letter from G. Edson; confer with A. Eberlin; analyze emails from client; email clients
03/26/2012	15	\$190.00	0.4	\$76.00	Review Notice of Pending Issue of Tax Deeds and 2008 payoff
03/28/2012	15	\$190.00	1.2	\$228.00	Multiple communications with E. Karasik; review notices from Bonner County; draft e-mail to G. Edson
03/29/2012	15	\$190.00	2.6	\$494.00	Research tax deed procedure; revise motion for contempt
03/30/2012	15	\$190.00	1.9	\$361.00	Revise motion for contempt; draft declaration of A. Eberlin
03/30/2012	10	\$250.00	0.9	\$225.00	Analyze emails from E. Karasik, R. Dishnica and J. Holley regarding communications with Bonner County and timing of RE Loans receipt of the notice of its intent to issue tax deeds; analyze draft motion for contempt against Bonner County; confer with A. Eberlin regarding same; analyze emails from client regarding review of same

04/02/2012	15	\$190.00	1.5	\$285.00	Review new drafts of declarations and motion; multiple communications with G. Edson and with client
04/03/2012	15	\$190.00	2.8	\$532.00	Review and revise declarations and draft of motion for contempt; multiple communications with co-counsel, client, G. Edson, and J. Rogers (Courtesy Discount)
04/03/2012	10	\$250.00	0.7	\$175.00	Analyze final draft motion for contempt; email client regarding the same; analyze emails from client and co-counsel regarding the same
04/03/2012	15	\$140.00	1.1	\$154.00	Review and organize documents
04/04/2012	15	\$190.00	2.1	\$399.00	Strategy meeting with R. Stacey; review letter from G. Edson; research regarding potential relief from stay motion (Courtesy Discount)
04/04/2012	10	\$250.00	0.9	\$225.00	Analyze email from R. Dishnica; analyze cost/benefit of pursuing fees against Bonner County; confer with A. Eberlin regarding the same; confer with A. Eberlin regarding research on Bonner County's ability to lift stay and its ability to accelerate the issuance of the tax deeds upon completion of the bankruptcy; email client regarding the same; analyze letter from G. Edson; analyze email from E. Karasik regarding same
04/05/2012	15	\$190.00	0.9	\$171.00	Review and analyze new letter from G. Edson; compile attorney's fees and review documents
04/06/2012	15	\$190.00	1.1	\$209.00	Multiple communications with E. Karasik; compile time entries
04/06/2012	10	\$250.00	0.6	\$150.00	Analyze billing statements and confer with A. Eberlin regarding the same; analyze emails from E. Karasik regarding negotiations with Bonner County
04/09/2012	15	\$190.00	0.3	\$57.00	Multiple communications with E. Karasik regarding G. Edson
04/09/2012	15	\$140.00	7	\$980.00	Analyze project documents
04/11/2012	10	\$250.00	0.3	\$75.00	Analyze emails from E. Karasik and J. Holley; respond to same
04/11/2012	15	\$190.00	0.4	\$76.00	Review e-mail from E. Karasik and review fees
04/12/2012	15	\$140.00	3.6	\$504.00	Continue to analyze project documents
04/13/2012	15	\$190.00	0.4	\$76.00	Review e-mails from E. Karasik and G. Edson
04/16/2012	15	\$190.00	3.5	\$665.00	Review e-mails to and from Dishnica; research PUD and public works process
04/16/2012	10	\$250.00	0.6	\$150.00	Analyze emails from J. Holley; prepare for and attend conference call with R. Dishnica, E. Karasik, J. Holley, and A. Eberlin
04/16/2012	10	\$170.00	0.9	\$153.00	Analyze pleadings filed by Bar-K and ACI regarding the motion to set aside default
04/17/2012	10	\$170.00	0.4	\$68.00	Analyze email from opposing counsel (.2); telephone conference with opposing counsel regarding the same (.2)
04/19/2012	15	\$190.00	0.5	\$95.00	Review documents from Edson
04/20/2012	15	\$190.00	0.6	\$114.00	Leave voicemail for Edson; review documents
04/23/2012	15	\$190.00	0.6	\$114.00	Review e-mails from G. Edson and E. Karasik
04/23/2012	10	\$250.00	0.3	\$75.00	Email J. Holley, R. Dishnica and E. Karasik regarding proposed settlement with Bonner County; analyze emails from J. Holley, R. Dishnica and E. Karasik regarding the same
04/25/2012	10	\$250.00	0.3	\$75.00	Analyze email from A. Eberlin and E. Karasik regarding stipulation to fees for motion for contempt
04/25/2012	15	\$190.00	0.9	\$171.00	Review stipulation and comparisons
04/26/2012	10	\$250.00	0.6	\$150.00	Analyze proposed stipulation and proposed changes to same; analyze email from R. Dishnica; email client approval of draft stipulation
04/30/2012	10	\$250.00	0.2	\$50.00	Analyze emails from E. Karasik and client regarding tax credit
05/01/2012	15	\$190.00	1.4	\$266.00	Multiple communications with co-counsel regarding tax liens; research regarding costs
05/23/2012	10	\$250.00	0.1	\$25.00	Analyze order entered by court regarding motion to lift bankruptcy stay
05/25/2012	10	\$170.00	0.6	\$102.00	Prepare for conference call with client
05/25/2012	10	\$170.00	0.8	\$136.00	Telephone conference with client
05/25/2012	15	\$140.00	1.1	\$154.00	Phone conference with clients; multiple communications with E. Karasik
05/29/2012	15	\$140.00	1.5	\$210.00	Review pleadings; confer with R. Stacey re same
05/29/2012	10	\$250.00	0.6	\$150.00	Analyze pleadings filed by Pacific Capital; analyze pleading filed by North Idaho Resort; analyze/edit schedule prepared by A. Eberlin and confer regarding changes to same
05/31/2012	15	\$140.00	0.5	\$70.00	Multiple communications with E. Karasik and other counsel regarding correcting bankruptcy court order
06/06/2012	15	\$190.00	1.6	\$304.00	Follow up on amended bankruptcy orders; draft email to client
06/07/2012	15	\$190.00	0.8	\$152.00	Research regarding plat and bond
06/19/2012	10	\$250.00	0.3	\$75.00	Analyze order from court lifting bankruptcy stay and confer with A. Eberlin regarding the same
06/22/2012	15	\$190.00	1.5	\$285.00	Draft motion for stay relief in state court
06/25/2012	15	\$190.00	1.6	\$304.00	Research and draft motion for stay relief in state court actions
06/26/2012	10	\$250.00	0.5	\$150.00	Analyze/edit motion and memorandum to lift stay; confer with A. Eberlin regarding edits to same
06/26/2012	15	\$190.00	0.9	\$171.00	Revise motion for stay relief
06/27/2012	15	\$190.00	1.2	\$228.00	Research liquidating of judgment; finalize stay relief motion
06/28/2012	10	\$250.00	0.4	\$100.00	Analyze motion to lift stay; confer with A. Eberlin regarding edits to same
06/28/2012	15	\$190.00	0.6	\$114.00	Finalize and file motions
06/29/2012	10	\$250.00	0.2	\$50.00	Analyze emails from R. Dishnica and E. Karasik regarding motion to lift stay
07/02/2012	10	\$170.00	0.3	\$51.00	Analyze order from court
07/02/2012	10	\$170.00	0.2	\$34.00	Analyze email from Fidelity regarding court order
07/02/2012	10	\$170.00	0.2	\$34.00	Analyze/draft response to Fidelity's email regarding court order
07/02/2012	10	\$170.00	0.2	\$34.00	Analyze email from client
07/02/2012	10	\$170.00	0.2	\$34.00	Analyze/draft response to client's email
07/02/2012	15	\$140.00	0.9	\$126.00	Analyze project and title documents
07/03/2012	15	\$140.00	2.4	\$336.00	Begin to research and draft summary judgment motions in state court
07/12/2012	10	\$250.00	0.2	\$50.00	Analyze email from client; reply to same
07/13/2012	10	\$250.00	0.2	\$50.00	Analyze email from client

07/19/2012	10	\$250.00	2.7	\$675.00	Analyze Reorganization Plan and Memorandum approving the same; email Liquidating Trustee; email client regarding the same
07/19/2012	10	\$170.00	2.7	\$459.00	Analyze pleadings in bankruptcy court (order confirming bankruptcy reorganizational plan, court's memorandum decision and findings of fact approving reorganizational plan; chapter 11 reorganization plan)
07/19/2012	10	\$170.00	0.6	\$102.00	Analyze pleadings in bankruptcy court
07/20/2012	10	\$170.00	0.2	\$34.00	Analyze email from opposing counsel regarding motion to lift stay
07/20/2012	10	\$250.00	0.3	\$75.00	Email client regarding; analyze response and reply to same
07/26/2012	10	\$250.00	8.1	\$1,525.00	Email and leave voicemail for D. Faulkner regarding issues related to liquidation of R.E. Loans assets; confer with M. Cooley regarding the same; telephone conference with E. Karasik regarding the same; analyze email from E. Karasik regarding the same; analyze Reorganization Plan and confirming same; analyze all exhibits to order confirming plan; research and analyze bankruptcy code regarding statutory rate of interest in bankruptcy cases; email client regarding impact of order upon state court actions and strategy to proceed based upon same
07/27/2012	10	\$170.00	0.2	\$34.00	Analyze pleadings filed in case by opposing counsel for Pensco Trust and Mortgage Fund 08 regarding motion to lift stay
	15	\$140.00	0.3	\$42.00	Review e-mails regarding motion to lift stay; voicemail from opposing counsel regarding hearing
08/01/2012	10	\$250.00	0.3	\$75.00	Draft email to client regarding hearing on motion to lift stay
08/02/2012	10	\$170.00	0.7	\$119.00	Attend second hearing and argue in favor of motion to lift stay
08/03/2012	10	\$250.00	0.2	\$50.00	Analyze email from M. Hines
08/06/2012	10	\$250.00	0.7	\$175.00	Research information to respond to M. Hines; draft/analyze email to same; draft email to client regarding status of motion to lift stay in Mortgage Fund 08 bankruptcy
08/06/2012	10	\$170.00	0.5	\$85.00	Analyze pleadings filed by Interstate Concrete
08/07/2012	10	\$170.00	0.6	\$102.00	Draft/analyze/edit proposed order lifting automatic stay and letter to counsel regarding the same
08/08/2012	10	\$250.00	0.1	\$25.00	Email client
08/09/2012	10	\$250.00	1.3	\$450.00	Analyze pleadings and correspondence in preparation for conference call; attend conference call with J. Holley and R. Dishnica
08/09/2012	10	\$170.00	0.6	\$102.00	Draft email to Fidelity updating status of case
08/13/2012	10	\$250.00	0.3	\$75.00	Analyze order stipulating to priorities and disclaimer of interest
08/16/2012	10	\$170.00	0.2	\$34.00	analyze pleadings filed by counsel for Mortgage Fund 08
08/23/2012	10	\$170.00	0.3	\$51.00	Analyze email from opposing counsel regarding status of orders lifting automatic stay; respond to same
08/29/2012	10	\$250.00	1.3	\$450.00	Analyze complaints filed in Pacific Capital, ITD, HCA and North Idaho Resorts cases; analyze/compare legal descriptions attached to same
08/30/2012	10	\$250.00	2.9	\$725.00	Analyze complaints and legals and email title company regarding the same; analyze title company response; analyze/draft email to title company requesting additional information; analyze/draft email counsel for North Idaho Resorts; analyze response from same; draft reply
08/31/2012	10	\$170.00	0.3	\$136.00	Analyze pleadings filed by opposing counsel
09/18/2012	10	\$250.00	0.2	\$50.00	Analyze email from J. Holley and respond to same; analyze second email from J. Holley
09/19/2012	10	\$250.00	1.1	\$275.00	Prepare for conference call with client; attend (2) conference calls to discuss Mortgage Fund 08 bankruptcy issues and necessity of lifting bankruptcy stay; compile documents requested by California counsel and email same to him
09/24/2012	10	\$250.00	0.6	\$150.00	Analyze email and attachments from title company regarding Trestle Creek property
10/03/2012	10	\$250.00	1.9	\$475.00	Analyze voicemail from J. Krause; analyze email and draft stipulation from J. Krause; analyze/compile list of cases with MF08 as a defendant; email same to J. Krause; analyze emails from J. Krause regarding MF08 cases; analyze ACI claims and respond to same; analyze email from J. Krause and confirm accuracy of draft Exhibit A and stipulation attaching same
10/08/2012	10	\$250.00	0.7	\$175.00	Email J. Krause regarding status of stipulation; analyze response from J. Krause and reply to same; analyze draft stipulation and email him regarding the same
10/11/2012	10	\$250.00	0.6	\$150.00	Analyze draft stipulations from J. Krause and emails regarding status of same; email J. Krause regarding approval of same
10/24/2012	10	\$250.00	1.8	\$400.00	Analyze Lake Front and Golf Course plans and other documents
10/29/2012	15	\$190.00	1.2	\$228.00	File review
[REDACTED]					
11/01/2012	15	\$190.00		\$0.00	No charge: Review of Plaintiff's discovery responses to Bar-K; First interrogatories and requests for production responses
11/12/2012	10	\$250.00	0.6	\$150.00	Email client regarding status of Mortgage Fund 08 bankruptcy; analyze response to same; reply to same regarding scheduling conference call
[REDACTED]					
11/20/2012	10	\$250.00	0.6	\$150.00	Prepare for teleconference with client; participate in teleconference call
12/10/2012	15	\$190.00	0.9	\$171.00	Review property records; e-mail to R. Mollerup
01/08/2013	10	\$170.00	0.4	\$68.00	Email Fidelity regarding status of MF08 bankruptcy
01/08/2013	10	\$170.00	0.2	\$34.00	Analyze email from client
01/15/2013	10	\$250.00	0.3	\$75.00	Draft notice to appear telephonically
01/28/2013	10	\$170.00	0.1	\$17.00	Prepare for teleconference call with client

01/28/2013	10	\$170.00	0.2	\$34.00	Telephone conference with client
01/28/2013	10	\$170.00	0.2	\$34.00	Analyze pleadings filed by opposing counsel
01/30/2013	10	\$170.00	0.2	\$34.00	Analyze notice of scheduling conference filed by the court
03/04/2013	10	\$250.00	0.4	\$100.00	Analyze review file regarding status of MF08 bankruptcy stay; email client regarding the same
03/12/2013	10	\$250.00	0.9	\$225.00	Analyze email from J. Krause regarding MFO8 refusal to stipulate to bankruptcy stay and possible affects of same; analyze draft motion to stay
03/15/2013	10	\$250.00	0.2	\$50.00	Telephone conference with J. Krause regarding motion to lift MF08 bankruptcy stay
[REDACTED]					
03/25/2013	10	\$250.00	2.8	\$700.00	Draft/analyze/edit email to Fidelity; analyze RE Loans documents; analyze Fidelity response; email J. Holley
[REDACTED]					
04/01/2013	10	\$250.00	0.2	\$50.00	Analyze letter and emails from F. Dekan to Fidelity
[REDACTED]					
04/03/2013	10	\$250.00	0.2	\$50.00	Telephone conference with S. Vogt
04/08/2013	10	\$250.00	0.2	\$50.00	Analyze email from client and respond to same
04/08/2013	10	\$250.00	0.3	\$75.00	Analyze email from S. Vogt and respond to same
04/12/2013	10	\$170.00	0.2	\$34.00	Analyze email from client
04/12/2013	10	\$170.00	0.7	\$119.00	Review subordination agreement and breach of same
04/12/2013	10	\$170.00	0.2	\$34.00	Email client
[REDACTED]					
04/12/2013	10	\$250.00	0.6	\$150.00	Analyze letter from Fidelity; email client regarding the same
[REDACTED]					
[REDACTED]					
04/18/2013	10	\$170.00	0.2	\$34.00	Analyze email from Fidelity and respond to same
04/18/2013	10	\$170.00	0.3	\$51.00	Email RE Loans regarding Fidelity email and analyze/respond to same
[REDACTED]					
[REDACTED]					
04/23/2013	10	\$170.00	2.1	\$357.00	Analyze property records to identify appropriate legal description of Trestle Creek property
[REDACTED]					
[REDACTED]					
05/02/2013	10	\$170.00	0.4	\$68.00	Telephone conference with R. Lynskey regarding expert testimony
05/08/2013	10	\$170.00	0.3	\$51.00	Analyze/draft email to R. Lynskey regarding expert testimony
05/08/2013	10	\$250.00	0.6	\$150.00	Confer with R. Lynskey regarding legal descriptions of the Trestle Creek (Lakefront) and Moose Mountain (Golf Course) properties; identify information for R. Lynskey and analyze/draft email regarding the same
05/14/2013	10	\$250.00	0.2	\$50.00	Email R. Lynskey regarding legal description
05/14/2013	10	\$170.00	1	\$170.00	Analyze/draft/edit expert witness disclosure
05/14/2013	10	\$170.00	0.3	\$51.00	Analyze documents in support of expert witness disclosure
05/15/2013	10	\$170.00	0.6	\$102.00	Analyze emails (3) from R. Lynskey regarding property legal



					descriptions and email client regarding the same
05/31/2013	15	\$190.00	1	\$190.00	Draft motion to lift stay
06/06/2013	10	\$170.00	0.9	\$153.00	Analyze/draft/edit motion to lift stay
06/12/2013	10	\$250.00	1.3	\$325.00	Draft/analyze/edit motion, memo and affidavit in support of lifting stay
06/17/2013	10	\$250.00	1.2	\$300.00	Draft/analyze/edit motions, memos and affidavits to lift stay
06/18/2013	10	\$170.00	0.2	\$34.00	Review client documents
06/20/2013	10	\$250.00	0.3	\$75.00	Confer with J. Meuleman regarding hearing on motion to lift bankruptcy stay
06/24/2013	10	\$250.00	2.1	\$525.00	Draft/analyze/edit motions, affidavits, notices of hearing and memoranda in support of motions to lift stay
06/26/2013	10	\$170.00	0.6	\$102.00	Review/analyze analyze client documents in preparation for conference call with J. Holley and R. Dishnica
06/26/2013	10	\$170.00	0.6	\$102.00	Participate in conference call with J. Holley and R. Dishnica
06/26/2013	10	\$170.00	0.9	\$153.00	Analyze additional client documents forwarded by client
[REDACTED]					
07/29/2013	10	\$250.00	1.3	\$325.00	Prepare for and attend hearings on motions to lift stay; telephone conference with opposing counsel regarding hearings on motions to lift stay
07/29/2013	15	\$190.00	0.2	\$38.00	Draft notice of intent to take default
07/30/2013	10	\$250.00	0.6	\$150.00	Draft orders to lift the stay
08/05/2013	19	\$190.00	1	\$190.00	Research regarding the expiration of the automatic stay; research regarding the discharge injunction
08/05/2013	15	\$190.00	0.4	\$76.00	Research regarding affect of discharge on automatic stay;
08/07/2013	15	\$190.00	0.7	\$133.00	Deposition preparation for deposition of R. Vilelli
08/12/2013	10	\$170.00	1.9	\$323.00	Analyze R.E. Loans dispersal documents and payment history reports
08/12/2013	10	\$170.00	0.9	\$153.00	Analyze balance owed to R.E. Loans
08/12/2013	10	\$170.00	0.4	\$68.00	Email J. Holley regarding amounts disbursed and balance owed
08/13/2013	10	\$170.00	0.6	\$102.00	Analyze documents in preparation for conference call with client
08/13/2013	10	\$170.00	0.4	\$68.00	Telephone conference with J. Holley regarding trial documents
08/13/2013	10	\$170.00	0.4	\$68.00	Telephone conference with R. Dishnica and J. Holley
08/14/2013	10	\$170.00	0.6	\$102.00	Analyze opposition to motion for summary judgment
08/16/2013	15	\$190.00	0.3	\$57.00	Draft NLR stipulation and disclaimer of interest
[REDACTED]					
10/08/2013	10	\$170.00	0.6	\$102.00	Email K. Ng and other former RE Loans employees
10/08/2013	10	\$170.00	0.2	\$34.00	Email R. Dishnica and J. Holley regarding RE Loans documents
10/15/2013	10	\$170.00	0.8	\$136.00	Prepare for and attend teleconference with clients
10/16/2013	10	\$170.00	3.3	\$561.00	Research summary judgment against Sage Holding
10/17/2013	10	\$170.00	2.9	\$493.00	Outline additional discovery to RC Worst
10/21/2013	10	\$170.00	2.9	\$493.00	Analyze/outline summary judgment against RC Worst; analyze prior discovery responses related to same; analyze other pleadings related to the same
10/31/2013	10	\$170.00	0.6	\$102.00	Analyze motion to dismiss Mtn West Bank; draft notice of non-objection to motion to dismiss Mtn West Bank
11/20/2013	5	\$245.00	3.7	\$906.50	Review email from J. Holley and attached letter from attorney for Bonner County regarding delinquent taxes and other amounts owed; create file; review 3/15/07 mortgagee's policy of title insurance; conference call with R. Dishnica, J. Holley and R. Stacey; review 5/8/12 bankruptcy order and 6/26/12 bankruptcy plan
11/21/2013	5	\$245.00	3.6	\$882.00	Prepare analysis memorandum on I.C. 83-1001 et seq.
11/22/2013	5	\$245.00	3.1	\$759.50	Prepare tax deed analysis memorandum and include I.C. 31-808
11/25/2013	5	\$245.00	0.4	\$98.00	Telephone conference with L. Call from Ada County Treasurer's office; telephone conference with G. Edson, attorney for Bonner County
11/26/2013	5	\$245.00	2.1	\$514.50	Telephone conference with L. Call (Ada County Treasurer's office); review 2002 ID Supreme Ct. case regarding redemption
12/02/2013	5	\$245.00	0.2	\$49.00	Telephone conference with G. Edson, attorney for Bonner County; review his email to counsel for liquidating trustee in Mortgage Fund 08 bankruptcy
12/05/2013	19	\$190.00	1	\$190.00	Analyze Idaho tax code regarding redemptions; shepardize redemption deed cases
12/09/2013	5	\$245.00	1.9	\$465.50	Prepare summary of Bonner County tax deed process; review 3/15/07 loan policy of title insurance; review 5/11/13 title commitment
12/11/2013	5	\$245.00	0.5	\$122.50	E-mail to J. Holley and R. Dishnica
12/19/2013	5	\$245.00	0.9	\$220.50	Prepares for and participate in conference call with R. Dishnica and J. Holley
12/23/2013	10	\$170.00	1.9	\$323.00	Analyze electronic documents produced by POBD
12/23/2013	10	\$170.00	0.2	\$34.00	Email counsel for POBD regarding status of discovery document hard copies
01/02/2014	10	\$250.00	2.1	\$525.00	Analyze emails from J. Krause (2) and draft/analyze responses to the same; confer with J. Krause regarding bankruptcy information requested by court; analyze emails from R. Dishnica regarding the same; analyze multiple emails from R. Dishnica and J. Krause regarding scheduling of telephone conference and reply to the same; analyze R. Dishnica and J. Krause emails; confer with C. Nicholson regarding draft pleadings; analyze email from J. Krause regarding the same
01/03/2014	10	\$250.00	1.1	\$275.00	Analyze draft pleadings and affidavit; confer with C. Nicholson regarding same via teleconference
01/08/2014	10	\$250.00	2.5	\$650.00	Prepare for and participate at hearing regarding bankruptcy stay and

01/10/2014	10	\$250.00	0.6	\$150.00	status conference
01/15/2014	10	\$250.00	0.4	\$100.00	Analyze non-objection filed by HOA and implications of same
					Telephone conference with J. Krause regarding hearing requesting bankruptcy clarification; compile requested documentation and email same to J. Krause



02/17/2014	10	\$250.00	2.9	\$725.00	Analyze documents from C. Reeves and RE Loans documents
02/26/2014	3	\$300.00	1.5	\$450.00	Review file, correspondence, title reports and Confirmation Order
03/03/2014	3	\$300.00	1.2	\$360.00	Review file and memos regarding property taxes; telephone conference with J. Krause
03/03/2014	10	\$250.00	0.3	\$75.00	Telephone conference with M. Brennan regarding status of case and confer with D. Mollerup regarding the same
03/04/2014	10	\$250.00	0.2	\$50.00	Confer with D. Mollerup to coordinate time for telephone conference with client; analyze emails related to the same
03/04/2014	3	\$300.00	1.2	\$360.00	Review file; telephone conference with attorney for Bonner County Treasurer; telephone conference with M. Brennan.
03/05/2014	3	\$300.00	1.4	\$420.00	Review Notices of Tax Sale; telephone conference with G. Edson, attorney for the County; review procedure for tax sales; telephone conference with Bonner County Treasurer; email J. Krause
03/05/2014	10	\$250.00	0.5	\$125.00	Confer with D. Mollerup; analyze emails from J. Holley; analyze emails from J. Krause
03/06/2014	10	\$250.00	0.3	\$75.00	Analyze email from M. Brennan and confer with K. Gowland regarding the same
03/06/2014	3	\$300.00	1.2	\$360.00	Telephone conference with RE Loans; telephone conference with Bonner County attorney.
03/07/2014	19	\$190.00	2.3	\$437.00	Research regarding property taxes and deed of trust
03/07/2014	3	\$300.00	2.5	\$750.00	Review printouts received from Bonner County; telephone conference with Bonner County Treasurer; memo to M. Brennan and J. Holley
03/07/2014	10	\$250.00	1.1	\$275.00	Confer with D. Mollerup; leave voicemail for J. Holley; telephone conference with M. Brennan; confer with B. Holleran regarding tax deed, redemption issues and research
03/07/2014	10	\$250.00	0.3	\$75.00	Analyze notice of scheduling conference
03/07/2014	10	\$250.00	0.3	\$75.00	Analyze fax from J. Miller regarding hearing on motion for fees/costs
03/07/2014	10	\$250.00	0.3	\$75.00	Analyze motion to dismiss filed by Mountain West Bank
03/10/2014	19	\$190.00	2.4	\$456.00	Research regarding tax liens; confer with R. Mollerup regarding case status; attend teleconference; research bankruptcy filings
03/10/2014	3	\$300.00	4.6	\$1,380.00	Telephone conference with R. Dishnica, M. Brennan and J. Krause; telephone conference with R. Lynskey at First American Title; review information received from First American; telephone conference with G. Edson; telephone conference with County Treasurer regarding subdivided lots; email to C. Plehl, County Treasurer
03/11/2014	3	\$300.00	4.5	\$1,350.00	Telephone conference with R. Lynskey at First American; multiple telephone conferences with C. Plehl; review schedule of taxes; email R. Dishnica and M. Brennan
03/10/2014	10	\$250.00	0.2	\$50.00	Analyze email from D. Kreifels and respond to the same
03/10/2014	10	\$250.00	0.4	\$100.00	Analyze pleadings filed by Mountain West Bank
03/10/2014	10	\$250.00	0.6	\$150.00	Telephone conference with B. Holleran regarding results of legal research and additional research issues



03/11/2014	10	\$250.00	0.3	\$75.00	Analyze pleadings filed by opposing counsel
03/12/2014	3	\$300.00	0.5	\$150.00	Review plats
03/13/2014	3	\$300.00	0.5	\$150.00	E-mail to M. Brennan and R. Dishnica
03/14/2014	10	\$250.00	0.3	\$75.00	Confer with D. Mollerup
03/14/2014	3	\$300.00	1	\$300.00	Review plats; emails to M. Brennan
03/17/2014	10	\$250.00	5.6	\$1,400.00	Analyze documents from J. Holley and C. Reeves
03/18/2014	10	\$250.00	4.9	\$1,225.00	Analyze project documents
03/19/2014	10	\$250.00	5.8	\$1,450.00	Continue to analyze documents
03/20/2014	10	\$250.00	5.4	\$1,350.00	Continue to analyze documents
03/20/2014	10	\$250.00	0.3	\$75.00	Analyze pleadings filed by POBD
03/25/2014	3	\$300.00	0.2	\$60.00	Telephone conference with G. Edson
04/01/2014	10	\$250.00	3.9	\$975.00	Analyze email and attachments from M. Brennan; confer with D. Mollerup regarding the same; analyze order dismissing the HOA claims against Mountain West Bank; prepare for phone conference; participate in phone conference with J. Holley, M. Brennan and R. Dishnica; confer with B. Holleran regarding tax sale research; telephone conference with T. McLaughlin regarding HOA issues
04/01/2014	3	\$300.00	4	\$1,200.00	Review tax information received from M. Brennan; telephone conference with RE Loans; telephone conference with R. Lynskey at First American; telephone conference with A. Knight; email to M. Brennan; telephone conference with client
04/02/2014	10	\$250.00	2.9	\$725.00	Analyze project documents
04/03/2014	10	\$250.00	2.6	\$650.00	Continue to analyze project documents
04/04/2014	10	\$250.00	0.9	\$225.00	Analyze Trestle Creek appraisal and email R. Dishnica and J. Holley regarding the same; analyze R. Dishnica's response to the same; confer with B. Holleran regarding property tax research

04/04/2014	19	\$190.00	2.9	\$551.00	Research tax deed; research redemption deed; research county deed
04/07/2014	19	\$190.00	5.8	\$1,102.00	Research Idaho case law regarding tax payment; research case law nationwide regarding same and regarding taxes and priority
04/07/2014	3	\$300.00	2	\$600.00	Telephone conference with G. Edson regarding manner of sale; second telephone conference with G. Edson regarding HOA; review statutes regarding priority of payment of taxes.
04/07/2014	10	\$250.00	3.2	\$800.00	Analyze research regarding property tax issues and confer with B. Holleran regarding the same; confer with D. Mollerup and M. Baldner; analyze/draft/edit motion to lift stay and dismiss claims in ACI's independent action; telephone conference with T. McLaughlin regarding HOA plans to pay taxes and issues related to the same
04/07/2014	10	\$250.00	1.6	\$400.00	Analyze/draft/edit outline in support of motion for summary judgment
04/08/2014	10	\$250.00	0.6	\$150.00	Continue to analyze project documents
04/08/2014	10	\$250.00	1.1	\$275.00	Confer with D. Mollerup and B. Holleran
04/08/2014	19	\$190.00	5.6	\$1,064.00	Research regarding subrogation; confer with R. Mollerup regarding same
04/08/2014	3	\$300.00	0.7	\$210.00	Telephone conference with F. Elsaesser
04/09/2014	19	\$190.00	2	\$380.00	Draft outline with respect to unpaid taxes
04/09/2014	3	\$300.00	1.5	\$450.00	Review process of tax deed and sale by county; telephone conference with G. Edson tax deed regarding process in Bonner County
04/09/2014	10	\$250.00	2.6	\$650.00	Analyze/draft/edit memorandum
04/10/2014	10	\$250.00	1.5	\$400.00	Complete analyzing/drafting/editing memorandum; email client regarding telephone call to discuss matter; email client memorandum
04/11/2014	10	\$250.00	2.1	\$525.00	Analyze/draft/edit memorandum; perform research related to the same
04/11/2014	10	\$250.00	1.1	\$275.00	Continue to analyze project documents
04/14/2014	10	\$250.00	0.3	\$75.00	Analyze email from opposing counsel regarding C. Reeves deposition and respond to the same
04/14/2014	10	\$250.00	0.2	\$50.00	Analyze response from opposing counsel regarding C. Reeves deposition
04/14/2014	10	\$250.00	0.3	\$75.00	Telephone conference with opposing counsel regarding possibility of obtaining an affidavit
04/14/2014	10	\$250.00	1.9	\$475.00	Prepare for conference call with client; confer with D. Mollerup prior to the same; participate in conference call; confer with B. Holleran regarding modifications to memo based upon the same
04/14/2014	19	\$190.00	3.1	\$589.00	Teleconference with client; research super-priority "tax lien"; draft/revise memo
04/14/2014	3	\$300.00	0.5	\$150.00	Telephone conference with M Brennan
04/15/2014	10	\$250.00	1.3	\$325.00	Analyze documents from client
04/15/2014	10	\$250.00	0.3	\$75.00	Email client regarding analysis of documents
04/15/2014	15	\$190.00	1.5	\$285.00	Research regarding ACI motion for summary judgment
04/16/2014	10	\$250.00	0.2	\$50.00	Email client
04/16/2014	10	\$250.00	0.4	\$100.00	Analyze response from client
04/17/2014	15	\$190.00	4.3	\$817.00	Continue research regarding motion for summary judgment against ACI
04/17/2014	10	\$250.00	0.6	\$150.00	Telephone conference with lawyer for multiple homeowners; confer with D. Mollerup regarding the same
04/17/2014	3	\$300.00	0.8	\$240.00	Telephone conference with F. Elsaesser; email to M. Brennan & R. Dishnica.
04/18/2014	3	\$300.00	0.2	\$60.00	E-mail to R. Dishnica
04/18/2014	10	\$250.00	0.9	\$225.00	Analyze email from F. Elsaesser; email R. Dishnica regarding the same; analyze his response; analyze/draft/edit memorandum to client
04/18/2014	10	\$250.00	1.1	\$275.00	Analyze documents and begin drafting affidavit of C. Reeves in support of RE Loans motion for summary judgment
04/18/2014	15	\$190.00	3	\$570.00	Continue research regarding motion for summary judgment against ACI
04/21/2014	10	\$250.00	1.9	\$475.00	Draft/analyze/edit affidavit of C. Reeves
04/21/2014	15	\$190.00	4.4	\$836.00	Begin drafting memorandum in support of motion for summary judgment against ACI
04/21/2014	10	\$250.00	2.3	\$575.00	Analyze/edit memorandum of law; analyze order on motion to compel; outline motion for summary judgment against the HOA; email clients regarding teleconference call
04/22/2014	10	\$250.00	3.1	\$775.00	Analyze/draft/edit memorandum of law to client; analyze response to same; draft/analyze replies; draft/analyze emails to client to schedule internal teleconference call; analyze responses to the same; conference call with D. Mollerup, R. Dishnica, M. Brennan, J. Holley, G. Hendersen
04/22/2014	10	\$250.00	1.4	\$350.00	Analyze/draft/edit F. Dakan affidavit
04/22/2014	15	\$190.00	2.4	\$456.00	Review case law regarding single contract versus separate contracts
04/22/2014	10	\$250.00	3	\$750.00	Analyze documents and draft/analyze/edit affidavit of F. Dakan
04/22/2014	15	\$190.00	2.2	\$418.00	Continue drafting memorandum supporting summary judgment against ACI
04/23/2014	10	\$250.00	0.2	\$50.00	Analyze emails from client
04/23/2014	10	\$250.00	0.4	\$100.00	Draft/analyze response to client emails
04/23/2014	10	\$250.00	0.8	\$200.00	Analyze/edit F. Dakan affidavit
04/23/2014	10	\$250.00	0.2	\$50.00	Analyze email from client
04/23/2014	15	\$190.00	2.6	\$475.00	Continue drafting summary judgment memorandum against ACI
04/23/2014	10	\$250.00	0.8	\$200.00	Confer with D. Mollerup; edit memorandum of law
04/24/2014	10	\$250.00	1.8	\$450.00	Analyze/outline motion for summary judgment against R.C. Worst
04/24/2014	10	\$250.00	1.9	\$475.00	Research motion for summary judgment against R.C. Worst
04/24/2014	10	\$250.00	0.3	\$75.00	Email opposing counsel regarding status of C. Reeves affidavit and analyze response to the same

04/24/2014	15	\$190.00	0.2	\$38.00	Revise summary judgment memorandum against ACI
04/24/2014	15	\$190.00	3.4	\$646.00	Research regarding waiver of lien right
04/24/2014	15	\$190.00	7	\$1,330.00	Review Daily Reports provided by ACI
04/24/2014	10	\$250.00	2.2	\$550.00	Begin analysis/draft memorandum in support of motion for summary judgment against R.C. Worst
04/24/2014	3	\$300.00	0.8	\$240.00	Review research regarding subrogation to prior lien.
04/25/2014	3	\$300.00	3	\$900.00	Review email from G. Edson; telephone conference with G. Edson; email to M. Brennan and R. Dishnica; second email to G. Edson; telephone conference with client and property owners
04/25/2014	10	\$250.00	1.7	\$425.00	Analyze/draft/edit memorandum in support of motion for summary judgment against RC Worst and affidavit in support of the same
04/25/2014	10	\$250.00	0.4	\$100.00	Email attorney for C. Reeves and analyze response to the same
04/25/2014	10	\$250.00	0.2	\$50.00	Analyze email from counsel for C. Reeves regarding affidavit changes
04/25/2014	10	\$250.00	0.6	\$150.00	Analyze/draft/edit changes to C. Reeves affidavit
04/25/2014	15	\$190.00	5.1	\$969.00	Finalize memorandum supporting summary judgment against ACI
04/25/2014	15	\$190.00	0.5	\$95.00	Draft Nicholson declaration supporting summary judgment against ACI
04/25/2014	15	\$190.00	0.3	\$152.00	Research effect of loan increase on priority
04/25/2014	10	\$250.00	2.2	\$550.00	Analyze documents to attach as exhibits to the affidavit
04/25/2014	10	\$250.00	1.9	\$475.00	Prepare for and participate in conference call with R. Dishnica, J. Holley, M. Brennan, S. Henderson, D. Mollerup and homeowners group; email meeting agenda to counsel for homeowners group
04/28/2014	10	\$250.00	3.1	\$775.00	Confer with D. Mollerup regarding email from J. Holley; analyze/draft/edit memo to client
04/28/2014	10	\$250.00	0.3	\$75.00	Analyze email from opposing counsel regarding C. Reeves affidavit
04/28/2014	10	\$250.00	0.6	\$150.00	Analyze/edit affidavit per request of C. Reeves
04/28/2014	10	\$250.00	0.2	\$50.00	Email counsel for C. Reeves the requested changes to affidavit and analyze response to the same
04/28/2014	10	\$250.00	0.3	\$75.00	Analyze executed affidavit and email to S. Sharpe
04/28/2014	3	\$300.00	3	\$900.00	Review email from J. Holley; review statutes; telephone conference with G. Edson, county attorney; memo to J. Holley; email to J. Holley
05/01/2014	10	\$250.00	1.1	\$275.00	Telephone conferences (2) with J. Finney regarding tax sale and statutory basis for the same; analyze statutes creating super-priority
05/05/2014	10	\$250.00	0.5	\$125.00	Analyze emails from client; analyze schedule and reply to the same; analyze emails coordinating conference call; conference call with D. Mollerup, R. Dishnica; and J. Holley
05/05/2014	10	\$250.00	0.1	\$25.00	Analyze order from court allowing counsel to attend the motion to dismiss telephonically
05/05/2014	15	\$190.00	2	\$380.00	Research regarding requirements for valid lien waiver
05/06/2014	10	\$250.00	0.2	\$50.00	Email D. Kreifels regarding stipulation to dismiss with prejudice
05/06/2014	15	\$190.00	0.6	\$114.00	Prepare for and attend motion to dismiss hearing
05/06/2014	15	\$190.00	0.2	\$38.00	Draft order lifting stay and dismissing R.E. Loans
05/06/2014	15	\$190.00	0.9	\$171.00	Research I.C. 12-120(3)
05/06/2014	15	\$190.00	0.7	\$133.00	Research regarding verification requirements
05/06/2014	10	\$250.00	0.6	\$150.00	Telephone conference with F. Elsaesser; email R. Dishnica
05/07/2014	10	\$250.00	0.3	\$75.00	Analyze email from F. Elsaesser; email R. Dishnica and J. Holley regarding the same; email F. Elsaesser regarding the same
05/08/2014	10	\$250.00	0.3	\$75.00	Analyze email from D. Kreifels and draft email to opposing counsel regarding stip to dismiss with prejudice
05/08/2014	10	\$250.00	0.6	\$150.00	Analyze/draft/edit stipulation to dismiss with prejudice
05/18/2014	15	\$190.00	3	\$570.00	Draft reply in support of summary judgment
05/19/2014	10	\$250.00	3.9	\$975.00	Analyze/draft/edit reply to ACI's opposition to summary judgment motion
05/20/2014	10	\$250.00	1.1	\$275.00	Analyze/edit/finalize reply brief in support of summary judgment motion against ACI
05/27/2014	10	\$250.00	0.4	\$100.00	Analyze/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI
05/27/2014	10	\$250.00	0.4	\$100.00	Analyze motion filed by Union Bank
05/27/2014	10	\$250.00	2.6	\$650.00	Prepare for hearing on motions for summary judgment
05/28/2014	10	\$250.00	0.3	\$75.00	Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst
05/28/2014	10	\$250.00	0.2	\$50.00	Telephone conference with B. Anderson regarding motion for summary judgment
05/28/2014	10	\$250.00	2.9	\$725.00	Analyze briefs and prepare for hearing on motions for summary judgment against R.C. Worst and ACI NW
05/28/2014	10	\$250.00	0.4	\$100.00	Analyze/draft edit stipulation for telephonic hearing
06/06/2014	15	\$190.00	0.3	\$57.00	Telephone conference with W. Haberman; telephone conference with R. Dishnica
06/09/2014	15	\$190.00	2	\$380.00	Prepare for summary judgment hearing
06/09/2014	15	\$190.00	0.5	\$95.00	Attend summary judgment hearing
06/09/2014	15	\$190.00	0.1	\$19.00	E-mail D. Kreifels status update
06/09/2014	3	\$300.00	1.5	\$450.00	3 Emails to G. Edson; emails to R. Dishnica; email exchange with C. Piehl, County Treasurer; email exchange with M. Brennan
06/10/2014	3	\$300.00	4	\$1,200.00	Review Purchase Agreement form for sale of Note; review Idaho Code regarding Redemption; email client; email G. Edson; telephone conference with and email to R. Dishnica; initial draft of purchase agreement
06/11/2014	3	\$300.00	4	\$1,200.00	Draft loan purchase agreement; multiple emails with R. Dishnica and

06/11/2014	10	\$250.00	0.3	\$75.00	M. Brennan; telephone conference with R. Dishnica and M. Brennan; draft changes to Loan Purchase Agreement; email to purchaser.
06/11/2014	10	\$250.00	0.6	\$150.00	Analyze order dismissing RC Worst's claims with prejudice
06/12/2014	3	\$300.00	0.4	\$120.00	Analyze pleadings filed by ACI
06/13/2014	3	\$300.00	0.6	\$180.00	E-mail to M. Brennan regarding status; review email from R. Dishnica; email to R. Dishnica
06/16/2014	3	\$300.00	0.5	\$150.00	E-mail to R. Dishnica; email to R. Stacey; email to R. Dishnica and M. Brennan re con call.
06/19/2014	10	\$250.00	0.3	\$75.00	Telephone conference with R. Dishnica, M. Brennan and Buyer
06/19/2014	10	\$250.00	0.4	\$100.00	Analyze pleading filed by Union Bank
06/19/2014	10	\$250.00	0.4	\$100.00	Analyze email from Fidelity and draft/analyze reply to the same; analyze email from R. Dishnica regarding the same; analyze documents filed by Union Bank

Subtotal for Fees 732.40 \$146,853.00

EXHIBIT A  
VALIANT FORECLOSURE  
All Fees Incurred

Trans Date	Atty	Rate	Hours to Bill	Amount	
07/07/2014	10	\$270.00	0.3	\$ 81.00	Analyze and respond to emails from client regarding conference call
07/08/2014	10	\$270.00	2.7	\$ 729.00	Prepare for and participate in conference call with client; analyze and respond to emails from B. Kramer; telephone conference with Mr. Kramer regarding conference call; analyze emails from W. Haberman
07/09/2014	10	\$270.00	2.1	\$ 567.00	Analyze caselaw; analyze wastewater facility agreements; telephone conference with T. McLaughlin regarding stipulation as to priority and dismissal of Valiant with prejudice; analyze email from Mr. McLaughlin regarding same
07/10/2014	10	\$270.00	0.6	\$ 162.00	Analyze Pensco Trust assignment documents
07/14/2014	10	\$270.00	2.8	\$ 756.00	Analyze and respond to email from M. Brennan; coordinate cases to obtain hearing dates on motions to substitute; analyze purchase and sale agreement, email First American; analyze response to same; email client; research guarantees; confer with J. Sykes
07/14/2014	10	\$270.00	2.1	\$ 567.00	Draft, analyze and edit motions to substitute Valiant as the real party in interest
07/15/2014	10	\$270.00	0.4	\$ 108.00	Telephone conference with R. Lynskey regarding litigation guarantee; analyze email regarding same; confer with J. Sykes regarding same
07/16/2014	10	\$270.00	1.4	\$ 378.00	Analyze and respond to email from R. Lynskey; analyze email from client; research foreclosure issues
07/17/2014	10	\$270.00	1.1	\$ 297.00	Analyze email from client; respond to same; telephone conference with client; analyze foreclosure issues
07/18/2014	10	\$270.00	0.7	\$ 189.00	Telephone conference with R. Lynskey; analyze documents/records needed for guarantee email same to Mr. Lynskey
07/21/2014	10	\$270.00	0.4	\$ 108.00	Analyze voicemail from title company; telephone conference with R. Lynskey; email to client
07/23/2014	10	\$270.00	0.4	\$ 108.00	Analyze email and attachments from client; draft and analyze response to same
07/24/2014	10	\$270.00	1.3	\$ 351.00	Draft new order on summary judgment in favor of Valiant; telephone conference with court clerk regarding same; analyze and respond to email from opposing counsel; telephone conference with R. Lynskey; analyze Mr. Lynskey's email; email to client
07/29/2014	10	\$270.00	3.7	\$ 999.00	Analyze Mortgage Fund 08 purchase and sale documents; analyze and draft litigation outline for foreclosure action
07/30/2014	10	\$270.00	4.3	\$ 1,161.00	Analyze Pensco's purchase and sale agreement; email W. Haberman; analyze litigation outline
07/31/2014	10	\$270.00	2.2	\$ 594.00	Draft and analyze email to title company; email client; analyze, draft and update outlines
08/04/2014	10	\$270.00	1.6	\$ 432.00	Analyze guarantee; analyze email and voicemail from B. Kramer; draft/analyze email to clients
08/05/2014	10	\$270.00	2.5	\$ 675.00	Analyze emails from client and respond to same; analyze pleadings filed by Union Bank; draft, analyze and edit motions to substitute Valiant as the real party in interest; analyze Court's memorandum decision granting motion for summary judgment; email client; analyze responses
08/08/2014	10	\$270.00	2.4	\$ 648.00	Draft, analyze and edit motions to substitute Valiant for Wells Fargo; locate and analyze documents for attachments to same
08/10/2014	10	\$270.00	0.3	\$ 81.00	Analyze emails from R. Lynskey and forward same to clients; analyze guarantee
08/11/2014	10	\$270.00	1.3	\$ 351.00	Analyze guarantee; confer with paralegal re same; analyze various documents
08/12/2014	10	\$270.00	1.2	\$ 324.00	Analyze letter and email client;

08/13/2014	10	\$270.00	1.3 \$	351.00	analyze/outline easement interests identified on the litigation guarantee Email D. Weitman regarding substitution as real party in interest for Wells Fargo; analyze response to same; email W. Haberman and B. Kramer regarding same; telephone conference with Mr. Haberman regarding same; analyze and edit changes requested by Mr. Weitman; email Mr. Weitman regarding same
08/14/2014	10	\$270.00	2.6 \$	702.00	Analyze/edit motions and related pleadings in support of motion to substitute for Wells Fargo; analyze/outline foreclosure complaint; analyze purchase and sale agreement; email client; analyze emails from client and respond to same
08/15/2014	10	\$270.00	2.3 \$	621.00	Draft, analyze and edit foreclosure complaint; analyze emails from client; analyze and draft responses to same
08/18/2014	10	\$270.00	5.9 \$	1,593.00	Draft, analyze and edit foreclosure complaint
08/19/2014	10	\$270.00	3.1 \$	837.00	Analyze, edit and final complaint; email same to W. Haberman; analyze email from R. Lynskey; email client regarding same; email Mr. Lynskey regarding same; analyze emails from Mr. Haberman and B. Kramer; draft, analyze and edit responses to same
08/20/2014	10	\$270.00	2.1 \$	567.00	Draft, analyze and edit motion to substitute Valiant as real party in interest for Wells Fargo; analyze and reply to email from W. Haberman; leave voicemail for R. Lynskey regarding same
08/21/2014	10	\$270.00	0.3 \$	91.00	Analyze pleadings
08/22/2014	10	\$270.00	0.3 \$	216.00	Analyze email from T. McLaughlin and proposed stipulation to priority of Valiant; draft/analyze email to Mr. McLaughlin regarding same; confer with C. Nicholson regarding scheduling conference; analyze response from Mr. McLaughlin; telephone conference with R. Lynskey
08/22/2014	15	\$195.00	0.2 \$	39.00	Attend telephonic status conference
08/26/2014	10	\$270.00	0.7 \$	189.00	Analyze emails from client; research issues with obtaining stipulated judgment; draft/analyze email responding to same
08/02/2014	10	\$270.00	1.4 \$	378.00	Analyze pleadings and litigation issues
[REDACTED]					
09/04/2014	10	\$270.00	0.8 \$	216.00	Telephone conference with G. Finney regarding 7 day extension to answer complaint; analyze email from client and draft/analyze reply to same; analyze pleadings filed by North Idaho Resorts and HOA related to the motion to substitute Valiant as the real party in interest
09/08/2014	10	\$270.00	0.2 \$	54.00	Telephone conference with R. Lynskey
09/10/2014	10	\$270.00	0.7 \$	189.00	Analyze email from client; telephone conference with W. Haberman
[REDACTED]					
09/12/2014	10	\$270.00	2.1 \$	567.00	Analyze email from C. Dodson; draft/edit acceptance of service; analyze email from T. McLaughlin regarding issue with maintenance facility; telephone conference with G. Finney regarding status of JV, LLC answer and request extension on behalf of ACI; analyze letter from HOA and email client regarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. Lynskey; analyze amended litigation guarantee; email client
[REDACTED]					
09/17/2014	8	\$160.00	0.6 \$	96.00	Study matrix for deadlines; review same
[REDACTED]					
09/18/2014	8	\$160.00	0.6 \$	96.00	Telephone conference with Netta Source regarding foreclosure action
09/19/2014	10	\$270.00	0.5 \$	162.00	Analyze email from counsel for First American Title; analyze litigation guarantee and draft and analyze response to same; coordinate with secretary to provide client all pleadings
09/24/2014	10	\$270.00	0.3 \$	81.00	Analyze emails from client and reply to same; email client regarding site visit; analyze emails from client; reply to same
09/24/2014	8	\$160.00	1.3 \$	208.00	Study default matrix; prepare and final motion and supporting pleadings for entry of default against T-O Engineers
09/25/2014	10	\$270.00	1.6 \$	432.00	Travel from Coeur d'Alene, Idaho to Sandpoint, Idaho and visit Idaho Club site
09/27/2014	15	\$225.00	0.4 \$	90.00	Research regarding licensing
10/01/2014	15	\$225.00	1.5 \$	337.50	Telephone conference regarding permits; research same
10/01/2014	10	\$270.00	1.3 \$	351.00	Analyze entry of default against T-O Engineers; outline answer to JV, LLC complaint; email client and analyze responses related to same
10/02/2014	15	\$225.00	0.2 \$	45.00	Analyze legal issue

10/03/2014	10	\$270.00	3.1 \$	837.00	Analyze purchase and sale agreements; draft/analyze/edit motions to appear as the real party in interest for Pensco Trust and MFOB.
10/07/2014	10	\$270.00	3.1 \$	837.00	Analyze/draft/edit affirmative defenses to JV cross claim; analyze/edit answer to JV, LLC claims; analyze motion filed by VP, LLC; to J. Breaux re: golf course; to and emails with client; confer w/ J. Sykes
10/08/2014	6	\$160.00	0.6 \$	96.00	Strategy conference with R. Stacey
10/10/2014	10	\$270.00	1.1 \$	297.00	Analyze withdrawal/recusal of Judge Griffin; analyze executed stipulation from counsel for RC Worst
10/14/2014	10	\$270.00	0.7 \$	189.00	E-mail to client re: withdrawal of judge; analyze responses and reply to the same.
10/17/2014	10	\$270.00	0.4 \$	108.00	verify assignment of cases to new judge and hearing dates; email client re: the same and analyze response.
10/20/2014	15	\$225.00	0.4 \$	90.00	Attend motion to substitute hearing.
10/24/2014	10	\$270.00	1.9 \$	513.00	Draft stipulation to judgment with First American; draft stipulation to judgment w/ POBD; analyze research memo; confer w/ C. Nicholson re: changes to the same; email client re: first Reeves stipulation; analyze client response to the same; analyze email from client
10/27/2014	10	\$270.00	0.8 \$	182.00	Draft new notices of hearings for motions to substitute as the real party in interest.
10/28/2014	10	\$270.00	2.7 \$	729.00	Begin drafting stip to judgment against First American Title; outline stipulation to judgment by POBD and affidavit of C. Reeves; analyze project/property records related to the same.
10/29/2014	6	\$160.00	1.2 \$	192.00	Review email correspondence from client; confer with R. Stacey regarding same; review affidavit of C. Reeves
10/29/2014	10	\$270.00	5.1 \$	1,377.00	Outline affidavit of C. Reeves; outline slips to judgment against POBD, POBH, and the Reeves; draft/edit/analyze stip to judgment against 1st American Title; analyze Idaho Club documents for exhibits to the affidavit of Charles Reeves.
10/30/2014	6	\$160.00	0.8 \$	128.00	Revise stipulation to entry of judgment
10/30/2014	10	\$270.00	4.8 \$	1,296.00	Draft/analyze/edit slips to judgment against POBD, POBH and Mr./Mrs. Reeves; draft/analyze/edit affidavit of Charles Reeves; compile documents to attach as exhibits.
10/31/2014	10	\$270.00	2.9 \$	783.00	Analyze emails from client re: proposed slips to judgment; reply to the same; analyze/draft/edit stipulations to judgment; draft/edit/analyze stipulation to entry of judgment against Sage Holdings; email amended stipulation to entry of judgment against First American; draft/analyze proposed stipulation to entry of judgment; email opposing counsel re: changes necessary to same; email opposing counsel stip for entry of judgment against Sage Holdings

11/05/2014	10	\$270.00	2.4 \$	648.00	Analyze email from C. Reeves; email clients regarding same; analyze client responses; leave voicemail for B. Chamberlain; analyze voicemail from same; telephone conference with B. Chamberlain regarding changes to affidavits; analyze email from B. Chamberlain regarding same; analyze affidavit and stipulation; email R. Lynskey questions related to lots
11/06/2014	10	\$270.00	2.1 \$	567.00	Analyze email from C. Reeves; telephone conference with B. Chamberlain regarding changes to affidavit; compile and email third party complaint and prior Reeves stipulation to B. Chamberlain; analyze emails from client; telephone conference with W. Haberman and B. Kraemer; analyze emails from clients;
11/07/2014	10	\$270.00	0.7 \$	189.00	Analyze email from client regarding changes to affidavits; analyze email from client and respond to same; analyze amended stipulation to judgment from First American.
11/08/2014	10	\$270.00	2.7 \$	729.00	Analyze email from C. Reeves regarding stipulations to judgment and affidavit; draft/analyze/edit changes to affidavit of C. Reeves and stipulation to judgment by POBD; analyze whether any changes necessary to stipulation to judgment by Reeves and POBDH; email client regarding same; analyze emails from client regarding same; draft/analyze responses to same
11/10/2014	15	\$225.00	2.9 \$	552.50	Draft memorandum; draft public records request; telephone conference with J. Tindall
11/10/2014	10	\$270.00	2.3 \$	621.00	Analyze email from client; respond to same; telephone conference with client regarding same; begin analysis of project documents
[REDACTED]					
11/18/2014	10	\$270.00	3.8 \$	972.00	Review pleadings and identify legal descriptions for stipulation with Sage Holdings; confer with J. Sykes; analyze schedule for unavailable dates for trial; draft/analyze/edit complaint
[REDACTED]					
11/20/2014	10	\$270.00	2.3 \$	621.00	Draft/analyze/edit motion to amend third party complaint; research same; analyze service issues
11/21/2014	10	\$270.00	2.8 \$	702.00	Outline defendants likely to stipulate to judgment; telephone conference with opposing counsel regarding same; follow up with P. Ware regarding status of MFOB documents; follow up with B. Featherston regarding status of Pensco Trust documents; review pleadings and analyze Valiant as real party in interest



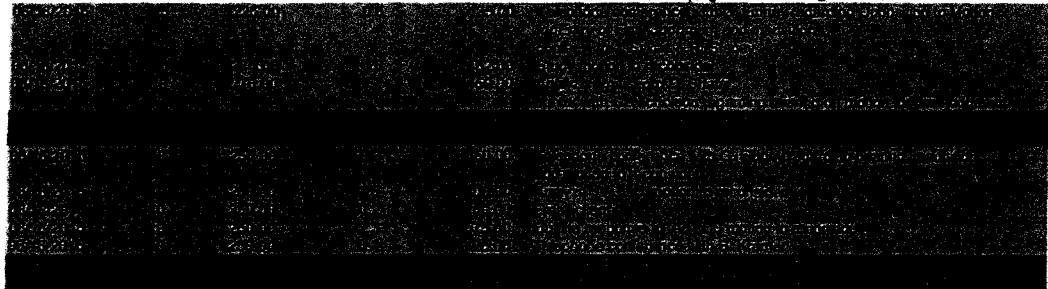
11/25/2014	10	\$270.00	0.5 \$	162.00	Verify soonest available hearing date with court; email client regarding same; analyze response and reply to same; verify that service of process is ongoing for remaining unserved parties; analyze initial witness disclosures and notice of deposition of B. Ng served by ACI
11/26/2014	6	\$270.00	0.4 \$	108.00	Confer with R. Stacey; study scheduling order
11/26/2014	10	\$270.00	0.1 \$	27.00	Analyze email from Panhandle Management
12/03/2014	6	\$270.00	4.2 \$	1,194.00	Begin study of real property record
12/04/2014	10	\$270.00	0.8 \$	216.00	Telephone conference with J. Finney regarding deposition dates and stipulation to judgment; telephone conference with T. McLaughlin; email D. Kriefels; email B. Anderson
12/04/2014	6	\$270.00	3.2 \$	864.00	Continue study of real property records
12/06/2014	6	\$270.00	3.4 \$	918.00	Study pleadings in prior cases related to summary judgment motions
12/09/2014	6	\$270.00	3.4 \$	918.00	Begin preparation of statement of facts for summary judgment motion
12/10/2014	6	\$270.00	5.2 \$	1,404.00	Study Reeves affidavit and pleadings; continue preparation of statement of facts
12/11/2014	10	\$270.00	2.6 \$	702.00	Analyze project documents; outline summary judgment arguments; draft notice of appearance on behalf of HLT and Independent Mortgage; draft/analyze/edit stipulation to judgment against HOA and Panhandle Management
12/11/2014	6	\$270.00	3.1 \$	837.00	Research legal arguments for summary judgment motion and supporting pleadings
12/12/2014	6	\$270.00	2.2 \$	594.00	Begin preparation of summary judgment motion and supporting pleadings; legal arguments
12/15/2014	6	\$270.00	7.4 \$	1,998.00	Continue preparation of summary judgment; revise statement of facts and legal argument
12/16/2014	10	\$270.00	2.4 \$	648.00	Confer with J. Sykes; analyze project documents; analyze legal description
12/16/2014	6	\$270.00	2.1 \$	567.00	Research issues related to summary judgment motion
12/16/2014	6	\$270.00	4.2 \$	1,134.00	Study research memorandum and related regulations
12/17/2014	10	\$270.00	0.6 \$	162.00	Draft/analyze stipulation to judgment against Mountain West Bank; analyze email from J. Hallin regarding the same; confer with J. Sykes
12/17/2014	15	\$225.00	0.5 \$	112.50	Draft public records request
12/17/2014	6	\$270.00	6 \$	1,620.00	Continue preparation of summary judgment motion and supporting pleadings; telephone conference with J. Hamilton; study real property records
12/18/2014	10	\$270.00	0.5 \$	162.00	Draft default judgment against Timberline; draft stipulation to judgment with ACI
12/18/2014	15	\$225.00	0.7 \$	157.50	Confer with J. Sykes regarding permits
12/18/2014	6	\$270.00	3.1 \$	837.00	Continue research relating to permit issue; prepare correspondence to client
12/22/2014	10	\$270.00	0.6 \$	162.00	Research motion for judgment on the pleadings
12/24/2014	10	\$270.00	0.4 \$	108.00	Analyze email and attached stipulation to dismiss from counsel for HOA
12/29/2014	10	\$270.00	0.7 \$	189.00	Analyze email from T. McLaughlin regarding stip to judgment (.3); analyze/edit stip to judgment against HLT (.3); confer with J. Sykes (.2)
12/29/2014	15	\$225.00	0.3 \$	67.50	Revise memo regarding permit issues
12/29/2014	6	\$270.00	0.9 \$	243.00	Prepare correspondence to client
12/30/2014	10	\$270.00	0.4 \$	108.00	E-mail to T. McLaughlin regarding issues with stipulation; draft/edit/analyze Panhandle Management disclaimer of interest
12/30/2014	6	\$270.00	3.4 \$	918.00	Prepare declarations to support summary judgment memorandum
12/30/2014	6	\$270.00	3.2 \$	864.00	Prepare interrogatories, requests for production and requests for admission to propound upon JV, North Idaho Resorts and VP
01/05/2015	6	\$270.00	0.9 \$	243.00	Telephone conference with clients
01/05/2015	6	\$270.00	2.9 \$	783.00	Research Bonner County ordinances; telephone conference with Bonner County employee
01/05/2015	6	\$270.00	3.1 \$	837.00	Continue preparation of summary judgment briefing
01/05/2015	6	\$270.00	1.2 \$	324.00	Correspondence with client; research foreclosure sale issues

01/06/2015	10	\$270.00	0.4 \$	108.00	Confer with J. Sykes
01/06/2015	6	\$270.00	2.5 \$	675.00	Telephone conference with Bonner County Planning Department; prepare and revise motion and supporting pleadings to serve Grants by publication
01/08/2015	10	\$270.00	0.9 \$	243.00	Analyze disclaimer of interest and draft certificates of service for the same; draft/analyze/edit errata pleading; analyze and execute stip to dismiss HOA and execute certificates of service for the same; draft/analyze stip to judgment with ACI Northwest; analyze email from counsel for Mountain West Bank
01/09/2015	10	\$270.00	0.4 \$	108.00	Confer with J. Sykes regarding summary judgment issues
01/09/2015	6	\$270.00	0.6 \$	162.00	Telephone conference with S. Niemann;
01/09/2015	6	\$270.00	3.9 \$	1,053.00	correspondence with clients regarding same Review and revise memorandum in support of motion for summary judgment
01/12/2015	6	\$270.00	5.2 \$	1,404.00	Revise summary judgment memorandum; study Union Bank case
01/12/2015	6	\$270.00	0.3 \$	81.00	Telephone conference with D. Shafer
01/13/2015	6	\$270.00	1.2 \$	324.00	Telephone conference with with J. Hallin, counsel for MWB, regarding stipulation to entry of judgment; revise same
01/13/2015	6	\$270.00	3.3 \$	891.00	Continue drafting summary judgment memorandum and supporting pleadings
01/14/2015	6	\$270.00	5 \$	1,350.00	Prepare summary judgment supporting declaration of counsel; revise summary judgment memorandum
01/15/2015	6	\$270.00	4.8 \$	1,296.00	Revise summary judgment legal arguments; final declaration of counsel
01/16/2015	10	\$270.00	3.1 \$	837.00	Analyze email from Fidelity; email client regarding the same; analyze response; analyze/edit draft reply; email client; confer with J. Sykes; analyze and edit motion for summary judgment confer with J. Sykes; telephone conference with T. Whitcomb
01/16/2015	6	\$270.00	3.5 \$	945.00	Telephone conference with client; final summary judgment pleadings
01/16/2015	6	\$250.00	2.9 \$	725.00	Prepare documents requested by client
01/20/2015	6	\$250.00	3.2 \$	800.00	Prepare discovery requests to propound upon JV, NIR and VP
01/20/2015	6	\$250.00	1.3 \$	325.00	Outline argument for summary judgment hearing
01/21/2015	10	\$270.00	0.3 \$	81.00	Analyze letter from Fidelity
01/21/2015	6	\$270.00	0.3 \$	81.00	Review correspondence and pleadings regarding publication of summons of Mr. and Mrs. Grant
01/21/2015	6	\$270.00	0.6 \$	162.00	Telephone conference with D. Shafer
01/21/2015	6	\$250.00	2.7 \$	675.00	Review and revise discovery requests to JV, NIR and VP
01/22/2015	6	\$250.00	0.5 \$	125.00	Correspondence with clients
01/23/2015	6	\$250.00	2.5 \$	625.00	Revise discovery requests [interrogatories, requests for production and requests for admission] to propound upon JV, NIR and VP
01/26/2015	6	\$250.00	2.7 \$	675.00	Final discovery requests for service upon JV, NIR and VP
01/26/2015	6	\$270.00	0.4 \$	108.00	Correspondence with B. Anderson regarding acceptance of service on behalf of HLT
01/29/2015	6	\$270.00	1.2 \$	324.00	Prepare and file motion for entry of default of Bar K, Inc.
01/29/2015	6	\$270.00	0.2 \$	54.00	Telephone conference with B. Anderson regarding acceptance of service for HLT
02/02/2015	6	\$270.00	0.9 \$	243.00	Review final and serve stipulation to entry of judgment with Mountain West Bank
02/02/2015	6	\$270.00	1.2 \$	324.00	Contact Bonner County to obtain information
02/03/2015	18	\$100.00	3.3 \$	380.00	Research requirements related to clubhouse
02/03/2015	10	\$270.00	0.4 \$	108.00	Confer with J. Sykes regarding litigation
02/04/2015	18	\$100.00	4.1 \$	410.00	Review case law; outline argument
02/05/2015	10	\$250.00	2.1 \$	525.00	Review/analyze Summary Judgment responses
02/05/2015	10	\$250.00	0.3 \$	75.00	Email client regarding same
02/05/2015	18	\$100.00	3.9 \$	390.00	Draft research memorandum
02/06/2015	10	\$270.00	0.6 \$	162.00	Analyze emails from client and confer with J. Sykes regarding same
02/09/2015	6	\$250.00	0.5 \$	125.00	Study file relating to proposed dismissal by ACI
02/09/2015	6	\$250.00	0.8 \$	200.00	Telephone conference with W. Heberman
02/09/2015	6	\$250.00	0.9 \$	225.00	Prepare stipulation to reschedule summary judgment hearing
02/11/2015	6	\$270.00	2.3 \$	621.00	Review Pensco Trust documents from B. Featherston; correspondence with B. Anderson regarding HLT Real Estate
02/12/2015	6	\$250.00	0.2 \$	50.00	Correspondence with S. Weeks and G. Finney regarding possible settlement conference
02/13/2015	6	\$250.00	0.9 \$	225.00	Correspondence with clients

02/18/2015	6	\$270.00	2.6	\$	702.00	Correspondence with client; review plat map; telephone conference with D. Shafer
02/19/2015	6	\$270.00	1.1	\$	297.00	Correspondence with D. Shafer regarding expert issues
02/23/2015	10	\$250.00	0.9	\$	225.00	Review/analyze emails from client and analyze/draft responses to the same
02/23/2015	10	\$250.00	2.1	\$	525.00	Review/analyze memorandums filed in opposition to client's motions for summary judgment
02/24/2015	6	\$250.00	4.2	\$	1,050.00	Continue preparation of reply memoranda to summary judgment oppositions by JV, NIR and VP
02/24/2015	6	\$270.00	2.2	\$	594.00	Prepare letter to Fidelity
03/03/2015	6	\$250.00	2.8	\$	700.00	Prepare correspondence to Fidelity
03/11/2015	6	\$250.00	2.2	\$	550.00	Begin preparation for hearing on summary judgment motions
03/12/2015	6	\$250.00	0.3	\$	75.00	Correspondence with D. Shafer
03/12/2015	6	\$270.00	0.3	\$	81.00	Correspondence with D. Shafer regarding expert issues
03/13/2015	6	\$250.00	1.2	\$	300.00	Telephone conference with B. Kramer and W. Haberman
03/16/2015	6	\$250.00	0.7	\$	175.00	Continue preparation for hearing on summary judgment motions
03/16/2015	10	\$250.00	0.6	\$	150.00	Travel to and from meeting with D. Shafer
03/16/2015	10	\$250.00	1.7	\$	425.00	Prepare for and attend meeting with D. Shafer
03/16/2015	10	\$250.00	0.6	\$	150.00	Analyze documents from D. Shafer
03/16/2015	6	\$250.00	2	\$	500.00	Appear for/attend hearing
03/16/2015	6	\$250.00	0.2	\$	50.00	Telephone conference with D. Shafer
03/16/2015	6	\$250.00	0.5	\$	125.00	Review/analyze maps
03/16/2015	10	\$270.00	0.6	\$	162.00	Travel to and from meeting with D. Shafer
03/16/2015	10	\$270.00	1.7	\$	459.00	Prepare for and attend meeting with D. Shafer regarding expert issues
03/16/2015	10	\$270.00	0.6	\$	162.00	Analyze documents from D. Shafer
03/16/2015	6	\$270.00	0.2	\$	54.00	Telephone conference with D. Shafer
03/16/2015	6	\$270.00	0.5	\$	135.00	Review/analyze documentation prepared by D. Shafer
03/17/2015	10	\$250.00	0.2	\$	50.00	Telephone conference with B. Anderson regarding status of hearing
03/17/2015	6	\$250.00	3.5	\$	875.00	Travel to Spokane, Washington for summary judgment hearing
03/18/2015	6	\$250.00	6.5	\$	1,625.00	Travel to Sandpoint, Idaho for summary judgment hearing and return to Spokane, Washington
03/18/2015	6	\$250.00	3.2	\$	800.00	Prepare for summary judgment hearing
03/18/2015	6	\$250.00	0.7	\$	175.00	Telephone conference with clients following summary judgment hearing
03/18/2015	6	\$250.00	3.5	\$	875.00	Return to Boise, Idaho from Spokane, Washington
03/19/2015	6	\$250.00	0.2	\$	50.00	Review and respond to correspondence from W. Haberman
03/23/2015	6	\$250.00	2.1	\$	525.00	Review correspondence from and telephone conference with D. Shafer
03/23/2015	6	\$270.00	2.1	\$	567.00	Review correspondence from and telephone conference with D. Shafer
03/24/2015	6	\$270.00	1.1	\$	297.00	Correspondence with B. Kramer; telephone conference with S. Nieman
03/24/2015	6	\$270.00	1.8	\$	486.00	Correspondence with D. Shafer regarding expert issues; correspondence with clients regarding same
03/24/2015	6	\$250.00	0.9	\$	225.00	Correspondence with D. Shafer
03/24/2015	6	\$250.00	0.6	\$	150.00	Review matrix of properties
03/24/2015	6	\$250.00	0.3	\$	75.00	Correspondence with clients
03/25/2015	6	\$250.00	0.2	\$	50.00	Telephone conference with D. Shafer
03/25/2015	6	\$270.00	0.7	\$	189.00	Correspondence with B. Kramer; telephone conference with J. Miller; telephone conference with S. Nieman
03/25/2015	6	\$270.00	0.2	\$	54.00	Telephone conference with D. Shafer regarding expert issues
03/26/2015	6	\$270.00	0.9	\$	243.00	Telephone conference with D. Shafer; review documentation; correspondence with clients regarding same
03/26/2015	6	\$250.00	1.3	\$	325.00	Prepare correspondence to D. Krefels
03/26/2015	6	\$250.00	0.4	\$	100.00	Review email correspondence
03/26/2015	6	\$250.00	0.4	\$	100.00	Telephone conference with D. Shafer
03/26/2015	6	\$250.00	0.3	\$	75.00	Review maps
03/26/2015	6	\$250.00	0.2	\$	50.00	Correspondence with clients
03/30/2015	10	\$250.00	2.1	\$	525.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6	\$250.00	0.6	\$	150.00	Telephone conference with D. Shafer

03/30/2015	6	\$250.00	0.8 \$	150.00	Study drawings
03/30/2015	6	\$250.00	0.4 \$	100.00	Telephone conference with clients regarding same
03/30/2015	10	\$270.00	2.1 \$	567.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6	\$270.00	1.6 \$	432.00	Telephone conference with D. Shafer regarding expert issues; telephone conference with clients regarding same
03/31/2015	6	\$250.00	0.8 \$	200.00	Telephone conference with D. Shafer and W. Haberman
03/31/2015	6	\$270.00	0.8 \$	218.00	Telephone conference with D. Shafer and W. Haberman
04/03/2015	5	\$270.00	1.2 \$	324.00	Review/analyze documentation prepared by D. Shafer
04/03/2015	6	\$270.00	0.6 \$	162.00	Telephone conference with D. Shafer
04/06/2015	6	\$270.00	0.4 \$	108.00	Telephone conference with S. Neiman
04/06/2015	10	\$270.00	2.7 \$	729.00	Analyze documentation prepared by D. Shafer; prepare outline regarding the same; telephone conference with D. Shafer regarding the same
04/08/2015	6	\$270.00	0.3 \$	81.00	Prepare letter to S. Neiman
04/10/2015	6	\$270.00	0.9 \$	243.00	Telephone conference with D. Shafer regarding expert issues
04/14/2015	6	\$270.00	1.1 \$	297.00	Begin preparation of Shafer declaration
04/15/2015	6	\$270.00	0.2 \$	54.00	Telephone conference with D. Shafer regarding expert issues
04/15/2015	6	\$250.00	0.5 \$	125.00	Correspondence with clients
04/15/2015	6	\$250.00	1.1 \$	275.00	Study summary judgment ruling
04/16/2015	6	\$250.00	0.2 \$	50.00	Telephone conference with T. McLaughlin
04/16/2015	6	\$250.00	0.3 \$	75.00	Correspondence with client
04/16/2015	10	\$270.00	1.6 \$	432.00	Analyze Summary Judgment decision; email client regarding the same and analyze responses
04/17/2015	10	\$270.00	1.6 \$	432.00	Prepare for and attend conference call with clients
04/17/2015	6	\$270.00	1.1 \$	297.00	Telephone conference with B. Kramer and others
04/21/2015	6	\$250.00	0.4 \$	100.00	Correspondence with Fidelity
04/24/2015	10	\$270.00	1.6 \$	972.00	Confer with J. Sykes regarding litigation
04/24/2015	6	\$270.00	1.3 \$	351.00	Confer with R. Stacey regarding litigation
04/27/2015	10	\$270.00	0.9 \$	243.00	Telephone conference with B. Haberman regarding summary judgment; confer with J. Sykes regarding same; email client; analyze client response
04/28/2015	6	\$270.00	5.9 \$	1,593.00	Begin preparation of notice decree of foreclosure
05/06/2015	10	\$270.00	3.3 \$	891.00	Confer with J. Sykes regarding issues related to litigation
05/07/2015	10	\$270.00	0.6 \$	162.00	Analyze emails from client; email client regarding the same
05/08/2015	10	\$270.00	3.6 \$	972.00	Research legal issues related to summary judgment
05/08/2015	10	\$270.00	0.1 \$	27.00	Analyze email from client; email J. Sykes regarding same
05/11/2015	10	\$270.00	4.1 \$	1,107.00	Analyze information from D. Shafer; outline Shafer declaration; analyze email from opposing counsel
05/11/2015	6	\$270.00	2.2 \$	594.00	Begin preparation of motion for entry of final judgment
05/12/2015	15	\$225.00	2.2 \$	495.00	Review and analyze documents received through public records request
05/12/2015	10	\$270.00	2.6 \$	702.00	Research redemption; confer with J. Sykes regarding same
05/13/2015	15	\$225.00	2.6 \$	585.00	Continue review of documents
05/13/2015	10	\$270.00	2.9 \$	783.00	Confer with J. Sykes; analyze Shafer documentation; confer with D. Shafer regarding same
05/13/2015	10	\$270.00	0.2 \$	54.00	Analyze email from D. Kreifels
05/14/2015	15	\$225.00	2.4 \$	540.00	Continue review of documents
05/15/2015	10	\$270.00	0.4 \$	108.00	Email D. Shafer regarding resume; analyze email from D. Shafer
05/15/2015	6	\$270.00	4.3 \$	1,161.00	Continue preparation of motion for entry of final judgment
05/18/2015	10	\$270.00	5.2 \$	1,404.00	Analyze real property documents; confer with J. Sykes regarding same; draft Shafer declaration; analyze D. Shafer documentation; analyze email from R. Lynskey; email R. Lynskey regarding same; conference call with R. Lynskey and D. Shafer
05/18/2015	6	\$270.00	4.9 \$	1,323.00	Continue preparation of motion for entry of final judgment; correspondence with Fidelity
05/19/2015	10	\$270.00	5.6 \$	1,512.00	Analyze email and documents from R. Lynskey; confer with D. Shafer; telephone conference with R. Lynskey and D. Shafer regarding the same; analyze documentation from R. Lynskey per conference call; analyze/draft/edit declaration of D. Shafer; email D. Shafer regarding the same; analyze/draft changes to declaration of D. Shafer; analyze/compile exhibits to declaration; analyze court scheduling order; draft expert witness disclosure for court; draft fact witness disclosure for court; emails to and from B. Haberman
05/19/2015	6	\$270.00	3.9 \$	1,053.00	Final motion for entry of final judgment and supporting pleadings; prepare witness disclosures; prepare motion for entry of default against Grants
05/26/2015	10	\$270.00	1.1 \$	297.00	Email client regarding conference call; analyze responses to the same; confer with C. Tipton regarding legal research; confer with J. Sykes; prepare letter to Fidelity
05/28/2015	10	\$270.00	3.3 \$	891.00	Prepare for and participate in conference call with D. Shafer; outline additional documents; emails with D. Shafer; analyze responses from D. Shafer
05/29/2015	18	\$100.00	0.7 \$	70.00	Research regarding foreclosure
05/29/2015	18	\$100.00	1.6 \$	160.00	Research regarding foreclosure
05/29/2015	10	\$270.00	1.3 \$	351.00	Analyze documents for additional information requested by D. Shafer
06/02/2015	18	\$100.00	3.2 \$	320.00	Research regarding foreclosure
06/03/2015	18	\$100.00	3.7 \$	370.00	Research and memorandum regarding foreclosure
06/04/2015	10	\$270.00	2.1 \$	567.00	Prepare for and attend conference call with D. Shafer

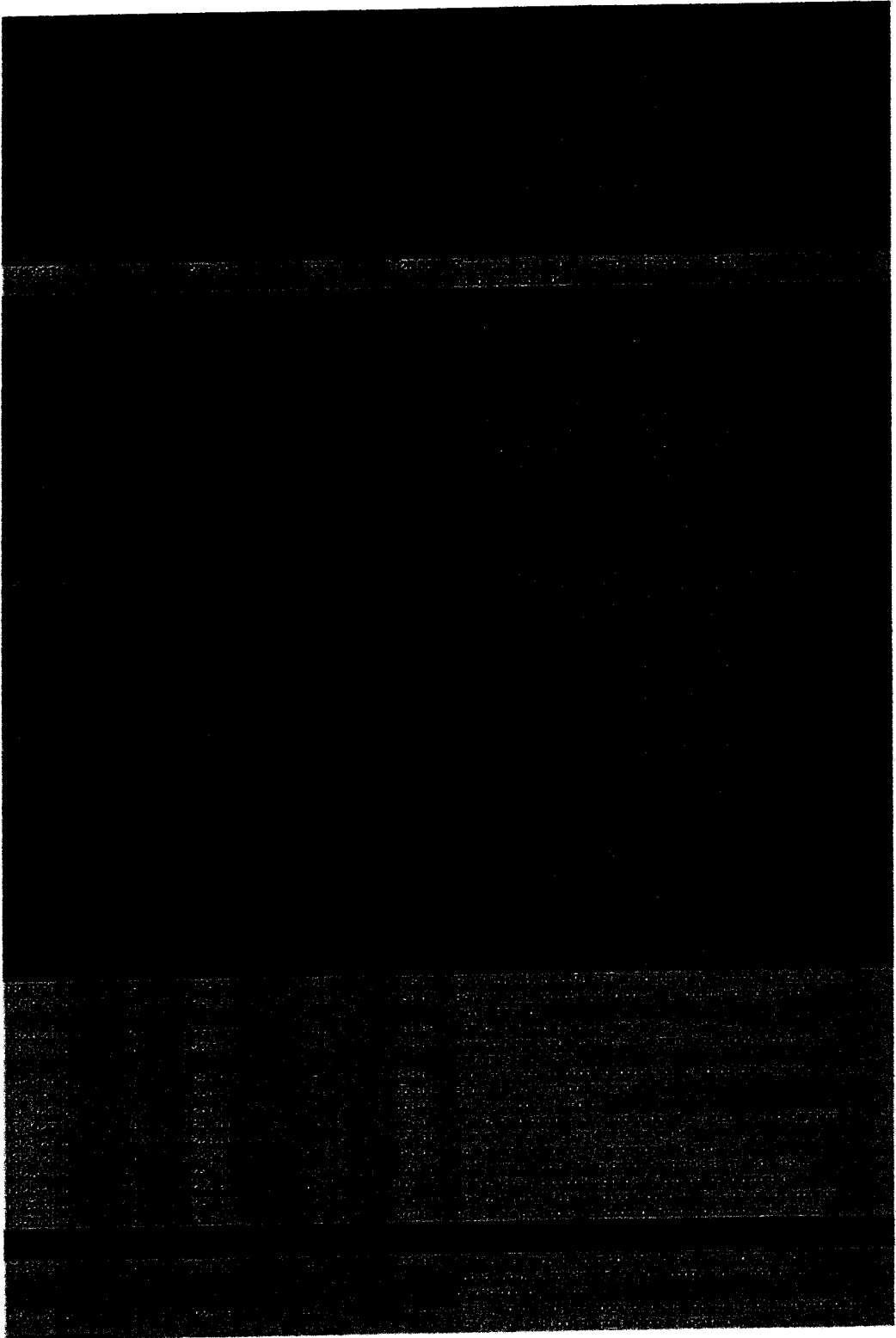
06/11/2015	18	\$100.00	6.7 \$	670.00	Research and memorandum regarding foreclosure
06/11/2015	15	\$225.00	2.6 \$	585.00	Complete document review
06/12/2015	18	\$100.00	3 \$	300.00	Finalize research memorandum regarding foreclosure
06/12/2015	15	\$225.00	0.6 \$	135.00	Review of motion for final judgment, supporting memo and declarations in preparation for 6/17 hearing
06/12/2015	10	\$270.00	4.4 \$	1,188.00	Analyze memo from C. Tipton; research caselaw cited in the same; prepare for and attend conference call with client; analyze (4) emails and attachments from D. Shafer; conference call with D. Shafer regarding documentation; email B. Haberman
06/13/2015	10	\$270.00	0.4 \$	108.00	Analyze email from B. Haberman; telephone conference with D. Shafer regarding the same
06/15/2015	10	\$270.00	2.3 \$	621.00	Analyze email and attachment from client; email the same to D. Shafer; telephone conference with D. Shafer; review motion for final judgment for hearing on same



06/17/2015	15	\$225.00	5.7 \$	1,282.50	Travel from Boise to Sandpoint, prepare for hearing, attend hearing, telephone conference with Brian Kramer
06/17/2015	10	\$270.00	0.6 \$	162.00	Confer with C. Nicholson regarding outcome of hearing on motion for final judgment
06/18/2015	15	\$225.00	2.1 \$	472.50	E-mail hearing update to B. Haberman; travel Spokane to Boise
06/20/2015	18	\$100.00	4.1 \$	410.00	Research regarding property use and redemption
06/21/2015	18	\$100.00	8.2 \$	820.00	Research other state laws and regarding property use and redemption
06/22/2015	15	\$225.00	0.5 \$	112.50	Hearing debrief with J. Sykes & R. Stacey
06/22/2015	8	\$270.00	0.4 \$	108.00	Confer with R. Stacey regarding form of final judgment
06/22/2015	10	\$270.00	0.5 \$	135.00	Analyze email and attachment from D. Shafer; email D. Shafer regarding the same
06/22/2015	15	\$195.00	2.8 \$	548.00	Research motion to reconsider
06/22/2015	15	\$195.00	1.9 \$	370.50	Research motion to reconsider and opposition to summary judgment
06/23/2015	8	\$250.00	1.7 \$	425.00	Analyze client documents and property records
06/23/2015	8	\$250.00	0.2 \$	50.00	Correspondence with clients
06/23/2015	15	\$195.00	1.7 \$	331.50	Research regarding standard of review for 11(a)(2)(B) motion
06/23/2015	10	\$250.00	1 \$	250.00	Analyze memorandum decision and order and confer with J. Sykes regarding the same
06/23/2015	10	\$250.00	0.4 \$	100.00	Email client
06/23/2015	15	\$225.00	0.1 \$	22.50	Review of Memorandum Decision and Order regarding motion for Entry of Final Judgment
06/23/2015	8	\$270.00	1.2 \$	324.00	Review draft of final judgment; correspondence with Fidelity
06/24/2015	15	\$195.00	0.9 \$	175.50	Begin drafting memoranda in opposition to JVVP/NIR motion to reconsider
06/24/2015	15	\$195.00	0.8 \$	156.00	Research I.C. 55-806
06/24/2015	15	\$195.00	1.4 \$	273.00	Continue drafting memoranda in opposition to JVVP/NIR Motions to Reconsider
06/24/2015	15	\$195.00	0.5 \$	97.50	Research standard of review
06/24/2015	15	\$195.00	1.3 \$	253.50	Research standard of review
06/25/2015	15	\$195.00	3.2 \$	624.00	Continue drafting memoranda in opposition to JVVP/NIR Motions to Reconsider
06/25/2015	15	\$195.00	0.8 \$	156.00	Review of Chuck Reeves deposition from Union Bank case
06/25/2015	15	\$195.00	1.2 \$	234.00	Research submission of admissible evidence
06/24/2015	10	\$270.00	2.3 \$	621.00	Analyze email from D. Shafer; analyze documents from client; analyze documents in preparation of judgment and order of sale
06/25/2015	10	\$270.00	4.1 \$	1,107.00	Analyze Shafer spreadsheet; confer with D. Shafer regarding the same; draft/analyze changes to reconciliation and email client regarding the same; outline proposed judgment and order; research foreclosure judgment; analyze emails to and from client;
06/25/2015	10	\$270.00	4.9 \$	1,323.00	Email client regarding Shafer reconciliation; email D. Shafer regarding the same; analyze/edit/draft final judgment; calculate prejudgment interest amounts for judgment; confer with J. Sykes; analyze (5) emails from client and draft/analyze responses to the same
06/26/2015	15	\$195.00	7.2 \$	1,404.00	Continue Drafting memoranda in opposition to JVVP/NIR Motions to reconsider
06/26/2015	8	\$250.00	1.5 \$	375.00	Draft affidavits and motion in support of motions to reconsider
06/26/2015	10	\$250.00	0.5 \$	125.00	Telephone conference with client
06/27/2015	10	\$270.00	2.7 \$	729.00	Analyze/draft/edit draft final judgment
06/29/2015	15	\$195.00	1.6 \$	312.00	Finish Drafting memoranda in opposition to JVVP/NIR Motions to Reconsider
06/29/2015	8	\$250.00	1.9 \$	475.00	Revise motions and affidavits in support of oppositions to motions to reconsider

06/29/2015	10	\$250.00	0.6 \$	150.00	Confer with J. Sykes and C. Nicholson
06/30/2015	10	\$270.00	0.4 \$	108.00	Conference call with D. Shafer
06/30/2015	10	\$270.00	1 \$	270.00	Research property locations on Bonner County Assessor's website
06/30/2015	10	\$270.00	1 \$	270.00	Research statute of frauds
07/01/2015	10	\$270.00	5.3 \$	1,431.00	Analyze /draft/edit motion and memorandum for proposed order of sale; analyze email from client and draft/analyze response to the same; confer with D. Shafer; analyze emails related to the same; forward documents to D. Shafer; email B. Haberman; analyze documents from clients
07/01/2015	10	\$250.00	2.8 \$	700.00	Analyze/draft/edit/finalize affidavits in support of memorandums in opposition to motions to reconsider
07/02/2015	10	\$270.00	0.3 \$	81.00	Analyze emails from D. Shafer to R. Lynskey; email D. Shafer regarding the same
07/04/2015	10	\$270.00	0.1 \$	27.00	Analyze email from B. Haberman
07/06/2015	10	\$270.00	2.4 \$	648.00	Analyze site maps and other documents from D. Shafer; analyze multiple emails from D. Shafer; draft responses to same; (3) telephone conference with D. Shafer; email B. Haberman; analyze multiple emails from B. Haberman and respond to the same
07/06/2015	10	\$250.00	1.1 \$	275.00	Review/analyze issues with service of oppositions to motion to reconsider
07/06/2015	10	\$250.00	1.4 \$	350.00	Draft/revise motion to vacate hearing date to serve opposition briefing
07/07/2015	10	\$250.00	3.1 \$	775.00	Prepare for motion to reconsider
07/07/2015	10	\$250.00	0.3 \$	75.00	Telephone conference with court clerk regarding waiver of objection for untimely filing
07/07/2015	10	\$250.00	0.1 \$	25.00	Analyze email from clerk regarding waiver of objection for untimely filing
07/07/2015	10	\$250.00	0.3 \$	75.00	Email client regarding status
07/07/2015	8	\$270.00	0.6 \$	162.00	Confer with R. Stacey
07/08/2015	8	\$270.00	0.9 \$	243.00	Research tax deeds; confer with R. Stacey regarding same
07/08/2015	15	\$225.00	0.2 \$	45.00	Analysis of redemption deed statutes with J. Sykes
07/08/2015	10	\$270.00	0.6 \$	162.00	Analyze emails from D. Shafer and respond to the same; analyze email from D. Staples; telephone conference with W. Haberman re same; analyze emails from W. Haberman
07/08/2015	10	\$250.00	9.7 \$	2,425.00	Travel to and from Sandpoint, Idaho
07/08/2015	10	\$250.00	3.4 \$	850.00	Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider
07/09/2015	10	\$250.00	2.7 \$	675.00	Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same
07/09/2015	10	\$250.00	0.3 \$	75.00	Analyze email from client
07/09/2015	10	\$250.00	0.2 \$	50.00	Draft/analyze response to client email
07/09/2015	10	\$270.00	3.9 \$	1,053.00	Prepare for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer and B. Haberman; analyze documents from D. Shafer; analyze property on Bonner County Assessor's website
07/10/2015	10	\$270.00	2.9 \$	783.00	Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer
07/13/2015	10	\$270.00	4.3 \$	1,161.00	Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman; draft/analyze email to him regarding the same
07/14/2015	10	\$270.00	3.1 \$	837.00	Analyze/draft/edit motion for proposed order; legal research re same
07/15/2015	10	\$270.00	2.7 \$	729.00	Analyze/draft/edit motion for proposed order; analyze emails from B. Haberman and respond to the same; analyze emails and attachments from D. Shafer and respond to the same
07/16/2015	10	\$270.00	1.3 \$	351.00	Analyze/draft memorandum in support of proposed order of sale
07/17/2015	18	\$100.00	0.8 \$	80.00	Research regarding sheriff requirements
07/17/2015	10	\$270.00	1.7 \$	459.00	Confer with C. Tipton regarding research; analyze legal memo; analyze email from court clerk; draft/analyze email to B. Haberman regarding the same; analyze response
07/20/2015	10	\$270.00	5.3 \$	1,431.00	Draft/analyze/edit declarations of D. Shafer and C. Reeves in support of proposed order of sale; telephone conference with B. Haberman; email B. Haberman; analyze email from C. Reeves; edit declaration; telephone conference with D. Shafer regarding declaration; analyze emails regarding the same; edit declaration; analyze exhibits to the Shafer declaration; edit/analyze order of sale
07/21/2015	10	\$270.00	5.8 \$	1,566.00	Draft/analyze/edit/finalize order of sale, declarations and memorandum

					in support of the same; draft/analyze/edit motion for order of sale; analyze emails from client and respond to the same; telephone conference with (2) B. Haberman; analyze and respond to emails from B. Haberman; analyze emails from D. Shafer; research related to memorandum in support of order of sale; telephone conference with court regarding decision on motion to reconsider; email B. Haberman
07/22/2015	6	\$270.00	1.1 \$	297.00	Review scheduling order; attend pretrial conference
07/22/2015	15	\$225.00	1.7 \$	382.50	Research regarding water rights; telephone conference regarding same;
07/22/2015	10	\$270.00	6.1 \$	1,647.00	Outline changes to judgment and foreclosure decree per court's memorandum decision; analyze emails from C. Reeves and client; confer with C. Nicholson and J. Sykes regarding the same; draft/analyze multiple emails to clients regarding same; confer with local counsel regarding the same; analyze emails from client and C. Reeves; perform legal research re same; analyze documents from D. Shafer and forward same to client
07/22/2015	10	\$250.00	2.9 \$	725.00	Analyze decision denying motions to reconsider
07/22/2015	10	\$250.00	1 \$	250.00	Email and telephone conferences (3) with client
07/23/2015	10	\$250.00	1.6 \$	400.00	Analyze/draft/edit changes to the judgment per court's memorandum decision denying motion to reconsider.
07/23/2015	10	\$270.00	3.3 \$	891.00	Analyze/draft/edit changes to the decree of foreclosure per court's memorandum decision; analyze litigation guarantees; request copies of recorded instruments from First American
07/23/2015	6	\$270.00	0.6 \$	162.00	Review/analyze judgment and order of sale
07/24/2015	15	\$225.00	1.4 \$	315.00	Research water rights
07/24/2015	10	\$270.00	4.1 \$	1,107.00	Analyze documents from B. Haberman; email D. Shafer; analyze emails from D. Shafer regarding same; verify accuracy of plats; research legal issues
07/24/2015	6	\$270.00	0.4 \$	108.00	Review/analyze decree of foreclosure
07/27/2015	10	\$270.00	0.4 \$	108.00	Analyze emails from B. Haberman and respond to the same; analyze email from R. Myers and respond to the same
07/28/2015	6	\$250.00	2.1 \$	525.00	Prepare correspondence regarding decisions issued by court on motions for reconsideration
07/29/2015	10	\$250.00	0.2 \$	50.00	Analyze emails from R. Meyers and B. Haberman
07/29/2015	10	\$270.00	1.6 \$	432.00	Analyze email from R. Myers; analyze email from B. Haberman; analyze emails from B. Haberman to R. Myers; email B. Haberman; prepare for and telephone conference with B. Haberman; email title company; analyze court order vacating hearing on proposed order of sale and requesting Order for entry granting the same; telephone conference with (2) court clerk and advise of preference for hearing to proceed
07/30/2015	10	\$270.00	9.8 \$	2,180.00	Email R. Myers regarding teleconference to discuss status of case; email B. Haberman regarding the same; analyze email from B. Haberman; leave voicemail for court clerk re: order vacating hearing on proposed order of sale; telephone conference with court clerk regarding the same
[REDACTED]					
07/31/2015	10	\$250.00	2.4 \$	600.00	Analyze documents from Bonner County Assessor
[REDACTED]					
[REDACTED]					
08/03/2015	10	\$270.00	1.6 \$	432.00	Analyze utility assessment documents
[REDACTED]					
08/05/2015	10	\$270.00	11.6 \$	3,132.00	Prepare for hearing; travel to Sandpoint, ID and back to Boise, ID; attend and argue in favor of motion at hearing; coordinate with court for execution of judgment; deliver and record judgment at Bonner County Recorder's Office; telephone conference with B. Kramer regarding outcome of hearing; B. Haberman regarding outcome of hearing
08/06/2015	18	\$100.00	6.1 \$	610.00	Research foreclosure sales
[REDACTED]					
08/08/2015	15	\$225.00	3.1 \$	697.50	Research regarding foreclosure sales
08/08/2015	10	\$250.00	0.2 \$	50.00	Analyze email from Fidelity
08/07/2015	18	\$100.00	5.5 \$	550.00	Research credit bidding
[REDACTED]					



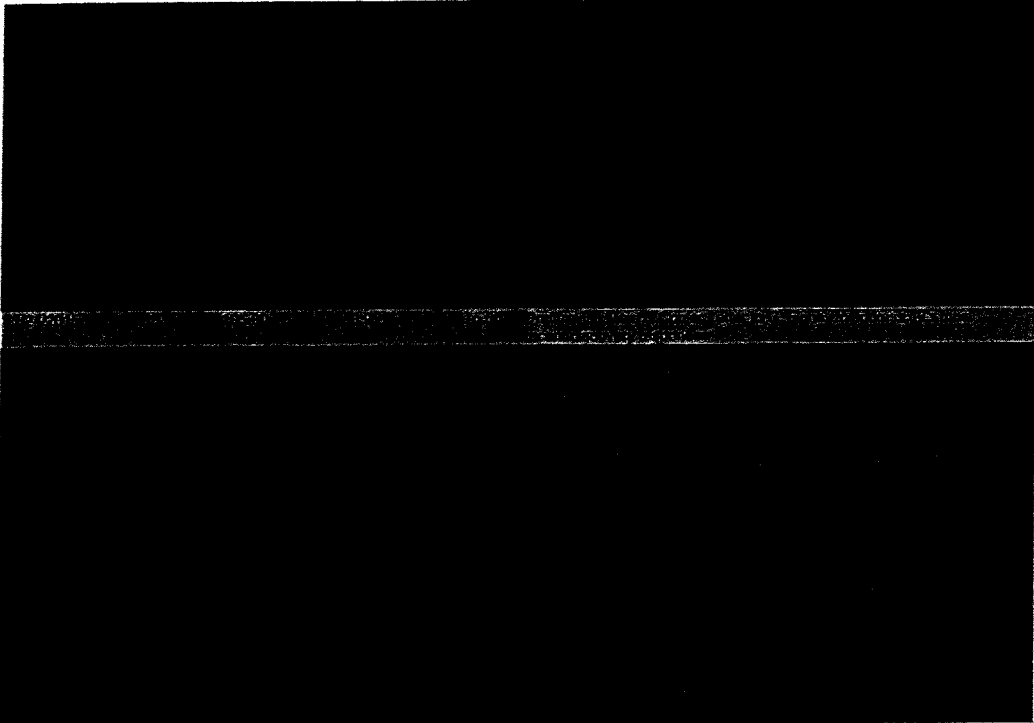


09/02/2015	10	\$270.00	8.3 \$	2,241.00	Travel from Boise, ID to Sandpoint, Idaho for the motion to alter/reconsider order of sale; prepare for hearing on Valiant's motion to alter or reconsider foreclosure decree and order of sale; confer with J. Sykes regarding the same; telephone conference with clients;
09/02/2015	6	\$250.00	2.7 \$	575.00	Prepare for hearing on third motion for reconsideration
09/02/2015	6	\$250.00	3.2 \$	800.00	Travel from Boise to Sandpoint, Idaho for hearings
09/02/2015	6	\$250.00	1.7 \$	425.00	Attend hearings
09/02/2015	6	\$250.00	1.6 \$	400.00	Telephone conference with clients regarding outcome of hearings
09/03/2015	6	\$250.00	3.2 \$	800.00	Return to Boise from Sandpoint, Idaho
09/03/2015	10	\$250.00	0.2 \$	50.00	Analyze emails and attachments from B. Haberman
09/03/2015	10	\$250.00	1 \$	250.00	Telephone conference with B. Haberman
09/03/2015	10	\$250.00	3 \$	750.00	Travel from Sandpoint, ID to Boise, ID
09/03/2015	15	\$225.00	0.2 \$	45.00	Respond to clients' request for documents
09/04/2015	10	\$250.00	1.9 \$	475.00	Analyze court ruling granting motion to reconsider
09/08/2015	10	\$250.00	0.3 \$	75.00	Telephone conference with B. Haberman
09/08/2015	10	\$250.00	0.5 \$	125.00	Analyze order setting trial and pretrial order
09/10/2015	10	\$250.00	6.6 \$	1,650.00	Analyze Pensco and MF08 loan documents, real property records and other documents of record in this case in preparation for motion to reconsider and in support of motion for summary judgment and confer with C. Nicholson regarding the same
09/14/2015	15	\$195.00	1.8 \$	351.00	Begin drafting Memo Supp. Motion to Reconsider the Court's 9-4-15 decision; confer with J. Sykes and R. Stacey
09/14/2015	10	\$250.00	1.4 \$	350.00	Outline arguments for motion to reconsider
09/14/2015	10	\$250.00	2.4 \$	600.00	Outline arguments for motion for summary judgment
09/14/2015	10	\$250.00	1.5 \$	375.00	Meet to discuss motion to reconsider, summary judgment and objection to proposed judgment
09/14/2015	6	\$250.00	1.9 \$	475.00	Outline issues for third summary judgment motion
09/15/2015	15	\$195.00	0.2 \$	39.00	Discuss research project with C. Tipton
09/15/2015	15	\$195.00	0.8 \$	156.00	Review and analysis of MF08 All-Inclusive Mortgage & Loan Agreement to prepare B. Ng Decl.
09/15/2015	15	\$195.00	0.8 \$	156.00	Begin preparing Ng Decl.
09/15/2015	18	\$100.00	2.3 \$	230.00	Discussion with C. Nicholson; Research regarding inconsistent declarations
09/16/2015	18	\$100.00	3.8 \$	380.00	Discussion with C. Nicholson; Research regarding inconsistent declarations
09/18/2015	15	\$195.00	3.5 \$	682.50	Draft Boney Ng decl.
09/17/2015	15	\$195.00	0.2 \$	39.00	Correspondence with W. Haberman
09/17/2015	15	\$195.00	0.3 \$	58.50	Review and analyze: POBD mortgages with R.E. Loans, MF08 & Pensco
09/17/2015	15	\$195.00	1.3 \$	253.50	Review and analyze loan agreements between POBD and RE Loans/MF08
09/17/2015	15	\$195.00	0.9 \$	175.50	Review and analysis of notes between POBD & RE Loans, Pensco & MF08
09/17/2015	15	\$195.00	0.6 \$	117.00	Review and analysis of Pensco related documents received from B. Ng
09/17/2015	15	\$195.00	2.1 \$	409.50	Review, analyze and compare Borrowers Funding Authorization & Analyze with Settlement Statement relied upon by VP/NIR/JV and other closing documents (check stub to POBD, CA disclosure form, etc.)
09/17/2015	6	\$250.00	0.3 \$	75.00	Review scheduling order regarding expert disclosures
09/17/2015	6	\$250.00	3.2 \$	800.00	Study second summary judgment motion and supporting pleadings
09/17/2015	6	\$250.00	0.9 \$	225.00	Telephone conference with F. Elaeasser
09/17/2015	6	\$250.00	0.3 \$	75.00	Telephone conference with W. Haberman
09/17/2015	18	\$100.00	4.5 \$	450.00	Research/Draft Argument regarding inconsistent Decl.
09/17/2015	6	\$270.00	1.2 \$	324.00	Telephone conference with F. Elaeasser regarding summary judgment motion; telephone conference with W. Haberman
09/18/2015	15	\$195.00	0.1 \$	19.50	Review Notice regarding proposed Judgment between VP, NIR & JV, order vacating 8/5/15 judgment, and order vacating 8/5/15 decree of foreclosure
09/18/2015	18	\$100.00	1.2 \$	120.00	Research regarding inconsistent Decl.
09/18/2015	15	\$195.00	0.8 \$	156.00	Telephone conference with J. Sykes, W. Haberman and E. Ford
09/18/2015	15	\$195.00	2.4 \$	468.00	Continue drafting Ng declaration

09/18/2015	6	\$250.00	1.4	\$	350.00	Revise declaration of B. Ng
09/18/2015	6	\$250.00	0.3	\$	75.00	Telephone conference with F. Elsaesser
09/19/2015	15	\$195.00	0.2	\$	39.00	Correspondence with Janet Robnett regarding representation of POBD in conjunction with closing of RE Loans, Pansco and MF08 loans
09/20/2015	15	\$195.00	1.3	\$	253.50	Complete initial draft of Ng Decl.
09/21/2015	15	\$195.00	0.9	\$	175.50	Prepare for and telephone conference with J. Sykes, W. Haberman and B. Ng
09/21/2015	15	\$195.00	0.3	\$	58.50	Review correspondence from W. Haberman
09/21/2015	15	\$195.00	1.6	\$	351.00	Revise Ng Decl.
09/21/2015	15	\$195.00	0.2	\$	39.00	Draft Third Motion for Summary Judgment
09/21/2015	15	\$195.00	2	\$	390.00	Begin Drafting Memo. Supp. 3rd Mot. for Summary Judgment
09/21/2015	6	\$250.00	1.2	\$	300.00	Telephone conference with B. Ng
09/21/2015	18	\$100.00	6.2	\$	620.00	Research/Draft Argument regarding inconsistent Decl.
09/22/2015	18	\$100.00	3.2	\$	320.00	Research regarding inconsistent Decl.
09/22/2015	6	\$270.00	0.9	\$	243.00	Correspondence with S. Rasor
09/22/2015	6	\$270.00	1.1	\$	297.00	Prepare documents for Rasor review
09/22/2015	15	\$195.00	0.8	\$	156.00	Finish revisions to second draft of Ng Declaration
09/22/2015	15	\$195.00	5.1	\$	994.50	Continue draft Memo Supp 3rd MSJ
09/22/2015	6	\$250.00	0.7	\$	175.00	Review and revise declaration of B. Ng
09/22/2015	6	\$250.00	1.4	\$	350.00	Correspondence with G. Finney regarding depositions of C. Reeves and First American
09/22/2015	6	\$250.00	0.8	\$	200.00	Correspondence with W. Haberman
09/22/2015	6	\$250.00	0.3	\$	75.00	Correspondence regarding Reeves deposition
09/23/2015	15	\$195.00	6.3	\$	1,818.50	Continue draft Summary Judgment
09/23/2015	15	\$195.00	0.6	\$	117.00	Strategy discussion with J. Sykes and C. Tipton
09/23/2015	18	\$100.00	10.2	\$	1,020.00	Draft Memo/Argument regarding Shafer Decl.
09/24/2015	15	\$195.00	6.1	\$	1,189.50	Finish drafting Memo Supp. 3rd Summary Judgment
09/24/2015	6	\$250.00	3.9	\$	975.00	Review and revise summary judgment memorandum and supporting pleadings
09/25/2015	6	\$250.00	0.2	\$	50.00	Correspondence with S. Rasor
09/29/2015	10	\$250.00	2.7	\$	675.00	Outline discovery to NIR and JV, LLC
09/29/2015	10	\$250.00	0.7	\$	175.00	Analyze scheduling order
09/29/2015	10	\$250.00	1.3	\$	325.00	Outline deposition notices to C. Reeves and R. Villali
09/29/2015	6	\$250.00	1.2	\$	300.00	Outline issues regarding depositions, discovery and summary judgment motion
10/01/2015	10	\$250.00	3.6	\$	900.00	Outline requests for admission and interrogatories to NIR, VP and JV
10/01/2015	10	\$250.00	0.6	\$	150.00	Telephone conference with client
10/01/2015	10	\$250.00	1.1	\$	275.00	Review/analyze project documents
10/08/2015	10	\$250.00	0.7	\$	175.00	Analyze legal descriptions
10/08/2015	10	\$250.00	0.8	\$	200.00	Review/analyze emails from D. Shafer
10/08/2015	10	\$250.00	0.5	\$	125.00	Telephone conference with D. Shafer
10/11/2015	10	\$250.00	0.2	\$	50.00	Review/analyze email from client
10/12/2015	10	\$250.00	0.6	\$	150.00	Email clients
10/12/2015	10	\$250.00	0.3	\$	75.00	Analyze emails from client regarding the same
10/13/2015	10	\$250.00	0.3	\$	75.00	Email C. Reeves regarding availability for deposition
10/14/2015	15	\$195.00	0.7	\$	166.50	Review and analysis of Ng Bankruptcy decl.
10/14/2015	6	\$250.00	1.1	\$	275.00	Review/analyze pleadings filed by NIR, JV and VP
10/14/2015	6	\$250.00	1.1	\$	275.00	Correspondence with client
10/14/2015	10	\$250.00	1.3	\$	325.00	Analyze rules of civil procedure and other legal issues
10/14/2015	10	\$250.00	0.9	\$	225.00	Telephone conference with B. Haberman
10/14/2015	10	\$250.00	0.4	\$	100.00	Analyze emails from B. Haberman
10/14/2015	10	\$250.00	0.4	\$	100.00	Analyze pleadings filed by B. Ng
10/14/2015	10	\$250.00	0.3	\$	75.00	Draft notice for client to attend hearing telephonically
10/15/2015	6	\$250.00	1.9	\$	475.00	Review/analyze correspondence from clients
10/15/2015	10	\$250.00	0.7	\$	175.00	Telephone conference with B. Haberman and B. Kramer
10/15/2015	10	\$250.00	1.8	\$	450.00	Outline response
10/15/2015	10	\$250.00	0.6	\$	150.00	Analyze emails from B. Haberman and B. Kramer

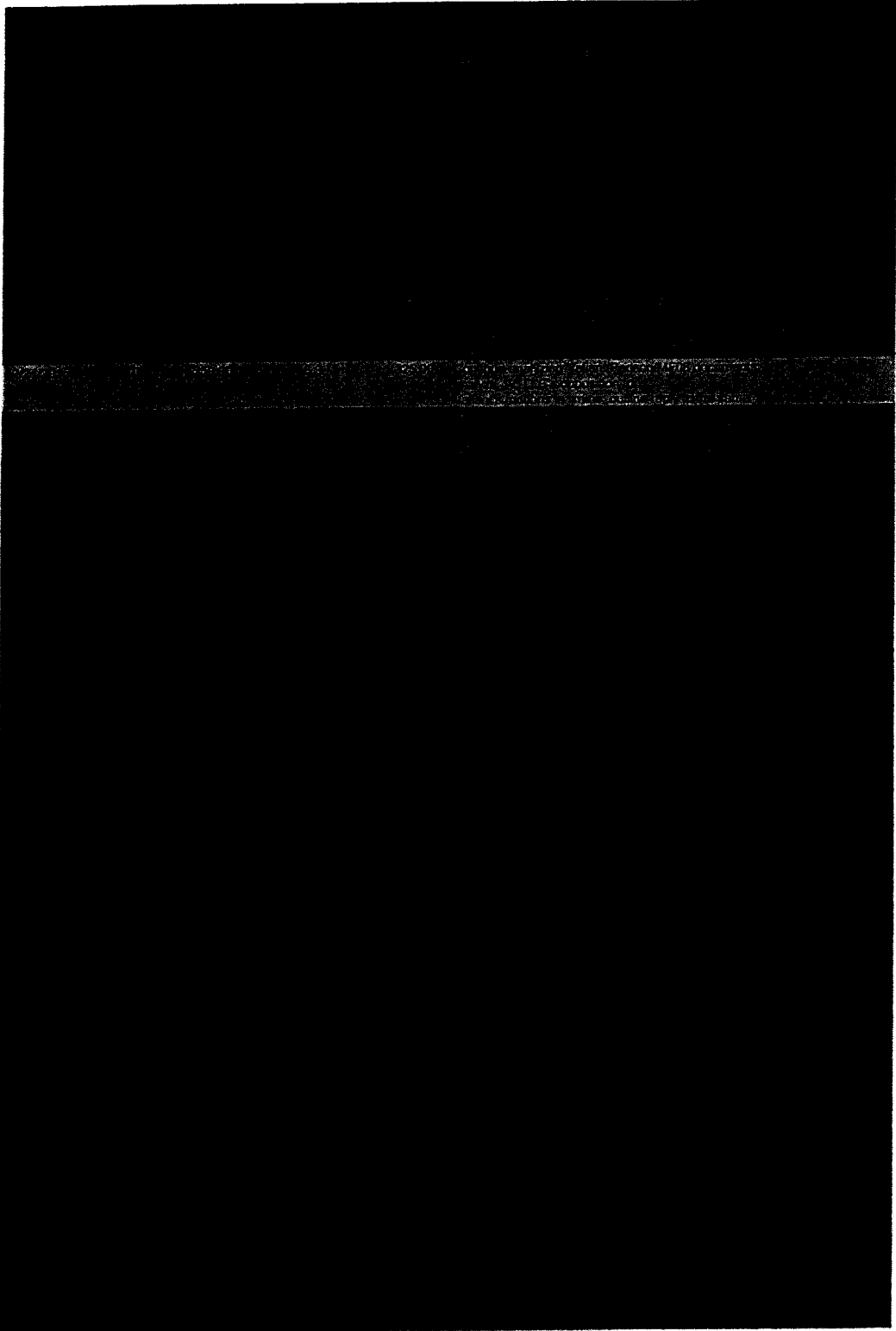
10/15/2015	10	\$250.00	0.8 \$	150.00	Analyze/edit additional points
10/15/2015	10	\$250.00	0.2 \$	50.00	Telephone conference with B. Haberman
10/15/2015	10	\$250.00	0.2 \$	50.00	Analyze email from client
10/15/2015	10	\$250.00	0.3 \$	75.00	Telephone conference with M. Hathaway
10/15/2015	10	\$250.00	2.3 \$	575.00	Compile documents and email the same to M. Hathaway
10/16/2015	15	\$195.00	1.6 \$	312.00	Draft/revise Decl/Aff Opp Third SJ Motion or alternative Request for Extension of Time to reply and revise supporting Nicholson decl
10/16/2015	10	\$250.00	0.8 \$	150.00	Analyze emails from B. Haberman and B. Kramer
10/16/2015	10	\$250.00	1.1 \$	275.00	Compile documents and email engineer
10/16/2015	10	\$250.00	0.6 \$	150.00	Telephone conference with B. Haberman and B. Kramer
10/16/2015	6	\$270.00	1.9 \$	513.00	Study FACTO file policies; draft correspondence to EATCO
10/18/2015	15	\$195.00	3.1 \$	604.50	Research regarding breach of note/loan agreement
10/19/2015	15	\$195.00	1.8 \$	351.00	Research breach of note/loan agreement
10/19/2015	10	\$250.00	1.7 \$	425.00	Draft/analyze/edit affidavit of B. Ng
10/19/2015	10	\$250.00	1.1 \$	275.00	Analyze documents related the foregoing reply pleadings
10/20/2015	15	\$195.00	1.1 \$	214.50	Analysis of exhibits submitted by JV and NIR/VP in opp to 3rd SJ Motion
10/20/2015	15	\$195.00	0.2 \$	39.00	Draft Nicholson Decl. Dated 10/20/15
10/20/2015	6	\$250.00	0.3 \$	75.00	Review/analyze second Ng Declaration
10/20/2015	6	\$250.00	0.8 \$	200.00	Prepare status update
10/20/2015	6	\$250.00	4.1 \$	1,025.00	Begin preparation for hearings on motions for reconsideration and second summary judgment motion
10/20/2015	10	\$250.00	0.4 \$	100.00	Analyze emails from client
10/20/2015	10	\$250.00	0.3 \$	75.00	Analyze/draft email to client
10/20/2015	10	\$250.00	0.2 \$	50.00	Analyze client responses
10/20/2015	10	\$250.00	0.7 \$	175.00	Draft/analyze/edit changes to B. Ng. Decl.
10/20/2015	10	\$250.00	0.2 \$	50.00	Email B. Ng
10/20/2015	10	\$250.00	0.2 \$	50.00	Telephone conference with B. Ng
10/20/2015	10	\$250.00	0.3 \$	75.00	Draft/analyze changes
10/20/2015	10	\$250.00	0.1 \$	25.00	Email the modified agreement to B. Ng
10/21/2015	15	\$195.00	0.7 \$	136.50	Research regarding residual exception to hearsay rule
10/21/2015	15	\$195.00	0.9 \$	175.50	Research regarding admissibility and use of impeachment evidence
10/21/2015	15	\$195.00	0.8 \$	156.00	Research regarding business record exception to hearsay rule
10/22/2015	6	\$250.00	2.2 \$	550.00	Continue preparation for hearings on motions for reconsideration and second summary judgment motion
10/22/2015	6	\$250.00	3 \$	750.00	Travel to Sandpoint, Idaho
10/22/2015	10	\$250.00	5.1 \$	1,275.00	Analyze briefing and prepare for hearing on motion for summary judgment
10/22/2015	10	\$250.00	2.9 \$	725.00	Travel to Spokane, Washington
10/23/2015	6	\$250.00	5 \$	1,250.00	Appear for/attend hearings on motions for reconsideration and second summary judgment motion
10/23/2015	6	\$250.00	1 \$	250.00	Telephone conference with clients regarding outcome of hearings
10/23/2015	6	\$250.00	3 \$	750.00	Return travel to Boise, Idaho
10/23/2015	10	\$250.00	7.5 \$	1,875.00	Prepare for hearing and attend hearing and argue motion for summary judgment
10/23/2015	10	\$250.00	3 \$	750.00	Travel to and from Spokane, WA to Sandpoint, ID
10/24/2015	10	\$250.00	3.8 \$	950.00	Travel from Spokane, WA to Boise, ID
10/26/2015	15	\$195.00	0.9 \$	175.50	Review mortgages
10/26/2015	6	\$250.00	2.9 \$	725.00	Correspondence with D. Kreifels
10/26/2015	6	\$250.00	0.4 \$	100.00	Review/analyze additional discovery to defendants
10/26/2015	6	\$250.00	0.9 \$	225.00	Research issues regarding tax parcel sales
10/26/2015	10	\$250.00	1.1 \$	275.00	Analyze previously propounded rogs and rfs
10/26/2015	10	\$250.00	3.1 \$	775.00	Draft/analyze/edit rfs and rogs to defendants VP, NIR and JV
10/26/2015	10	\$250.00	0.8 \$	200.00	Draft/analyze/edit expert witness disclosures
10/26/2015	10	\$250.00	0.4 \$	100.00	Coordinate resumes and other information from experts for expert disclosures

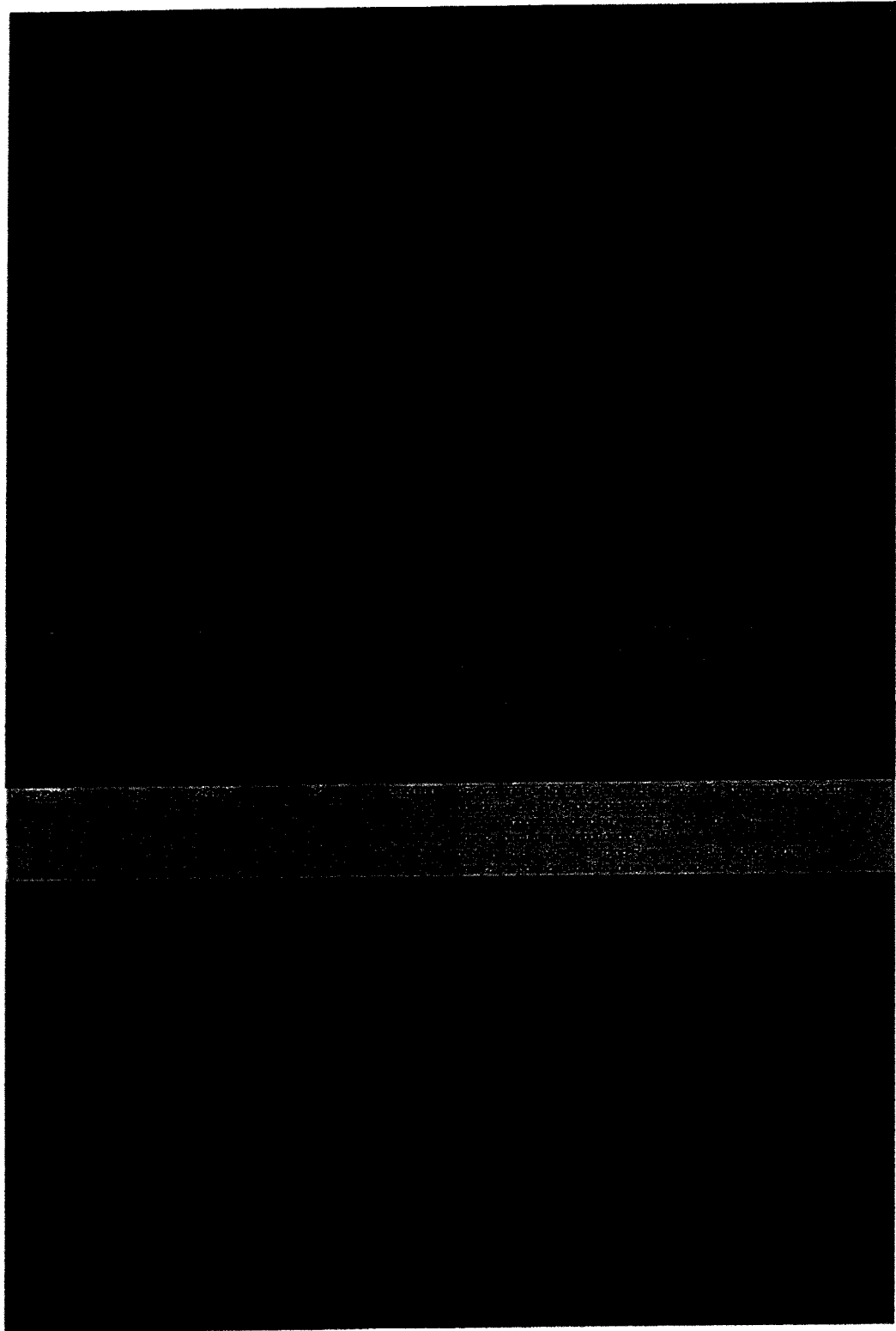
10/26/2015	10	\$250.00	0.4 \$	100.00	Draft/analyze/edit lay witness disclosures
10/26/2015	10	\$270.00	3.6 \$	972.00	Analyze email from M. Hathaway; telephone conference with M. Hathaway regarding expert witness duties; conference call with M. Hathaway and D. Shafer regarding the same; analyze Shafer exhibits in preparation for conference call; analyze multiple emails back and forth between M. Hathaway and D. Shafer
10/27/2015	10	\$270.00	1.1 \$	297.00	Analyze email from counsel for First American; draft/analyze/edit response to the same
10/27/2015	15	\$195.00	4.4 \$	858.00	Analysis of documents produced by First American Title Co.
10/27/2015	10	\$250.00	0.3 \$	75.00	Draft/analyze notices of service for discovery to JV, NIR and VP
10/27/2015	10	\$250.00	0.3 \$	75.00	Draft/analyze email to counsel for First American re: deposition dates
<b>[REDACTED]</b>					
10/27/2015	10	\$250.00	2.7 \$	675.00	Analyze documents from Sandpoint Title
10/28/2015	6	\$250.00	1.2 \$	300.00	Revise correspondence to D. Kreifels
<b>[REDACTED]</b>					
10/28/2015	10	\$250.00	0.3 \$	75.00	Email First American regarding documents produced to JV and NIR
10/28/2015	10	\$250.00	0.2 \$	50.00	Analyze response to the same
10/28/2015	10	\$250.00	0.3 \$	225.00	Analyze/draft/edit emails to counsel for First American
10/29/2015	10	\$250.00	0.3 \$	75.00	Analyze responses to the same
10/29/2015	10	\$250.00	1.4 \$	350.00	Compile documentation requested by First American and email the same to counsel for the same
10/29/2015	10	\$250.00	0.6 \$	150.00	Compile documentation for D. Shafer
10/29/2015	10	\$250.00	0.3 \$	75.00	Analyze email from court clerk
10/29/2015	10	\$250.00	1.6 \$	400.00	Analyze emails from client and respond to the same
10/29/2015	10	\$250.00	0.9 \$	225.00	Analyze emails (6) from M. Hathaway and D. Shafer
10/29/2015	10	\$250.00	0.3 \$	75.00	Prepare for conference call with M. Hathaway and D. Shafer
10/29/2015	10	\$250.00	0.6 \$	150.00	Participate in conference call
10/29/2015	10	\$250.00	0.3 \$	75.00	Analyze email from G. Edson
10/29/2015	10	\$250.00	0.3 \$	75.00	Email G. Edson
10/30/2015	15	\$195.00	0.5 \$	97.50	Review of Disclosure Statement for Joint Chapter 11 Plan of Recognition filed in R.E. Loans Texas bankruptcy
10/30/2015	6	\$250.00	0.8 \$	200.00	Review and respond to correspondence from D. Kreifels
10/30/2015	10	\$250.00	0.8 \$	200.00	Analyze emails and voicemail from G. Edson and leave voicemail in response to the same
11/02/2015	15	\$195.00	2.1 \$	409.50	Review/analyze R.E. Loans Bankruptcy filings
11/02/2015	6	\$250.00	1.6 \$	400.00	Correspondence to D. Kreifels
<b>[REDACTED]</b>					
11/02/2015	10	\$250.00	0.6 \$	150.00	Telephone conference with G. Edson
11/02/2015	10	\$250.00	0.4 \$	100.00	Telephone conference and email with client
11/03/2015	15	\$195.00	0.3 \$	58.50	Continue Review of RE Loans bankruptcy
11/03/2015	10	\$250.00	0.6 \$	150.00	Analyze letter from G. Edson
11/03/2015	10	\$250.00	0.3 \$	75.00	Telephone conference and email with client
11/03/2015	10	\$270.00	1.2 \$	324.00	Analyze emails from M. Hathaway; respond to same conference call with M. Hathaway and D. Shafer regarding same
11/04/2015	10	\$270.00	1.5 \$	405.00	Telephone conference with B. Haberman; telephone conference with Bonner County regarding tax parcel issues; draft/analyze email to B. Haberman
11/05/2015	10	\$250.00	0.9 \$	225.00	Analyze availability and strategy for taking depositions and leave voicemail for D. Marfice regarding deposition dates
11/05/2015	10	\$250.00	0.5 \$	125.00	telephone conference with paralegal for Susan Weeks and G. Finney regarding deposition
11/05/2015	10	\$250.00	0.4 \$	100.00	telephone conference with P. DeAngeli regarding scope of Lynskey testimony
<b>[REDACTED]</b>					
11/05/2015	10	\$250.00	0.3 \$	75.00	Telephone conference with P. DeAngeli
11/05/2015	10	\$250.00	1.2 \$	300.00	Analyze Sandpoint Title documents and email from M. Hathaway and telephone conference with Mr. Hathaway
11/10/2015	6	\$250.00	0.3 \$	75.00	Revise correspondence with Fidelity
11/10/2015	10	\$250.00	3.7 \$	925.00	Analyze FATCO documents and draft deposition outlines for the same
11/11/2015	15	\$195.00	1 \$	195.00	Analysis of Court's Decision regarding 3rd MSJ and other motions heard on October 23, 2015
11/12/2015	6	\$250.00	1.2 \$	300.00	Study memorandum decision and order on summary judgment motion
<b>[REDACTED]</b>					

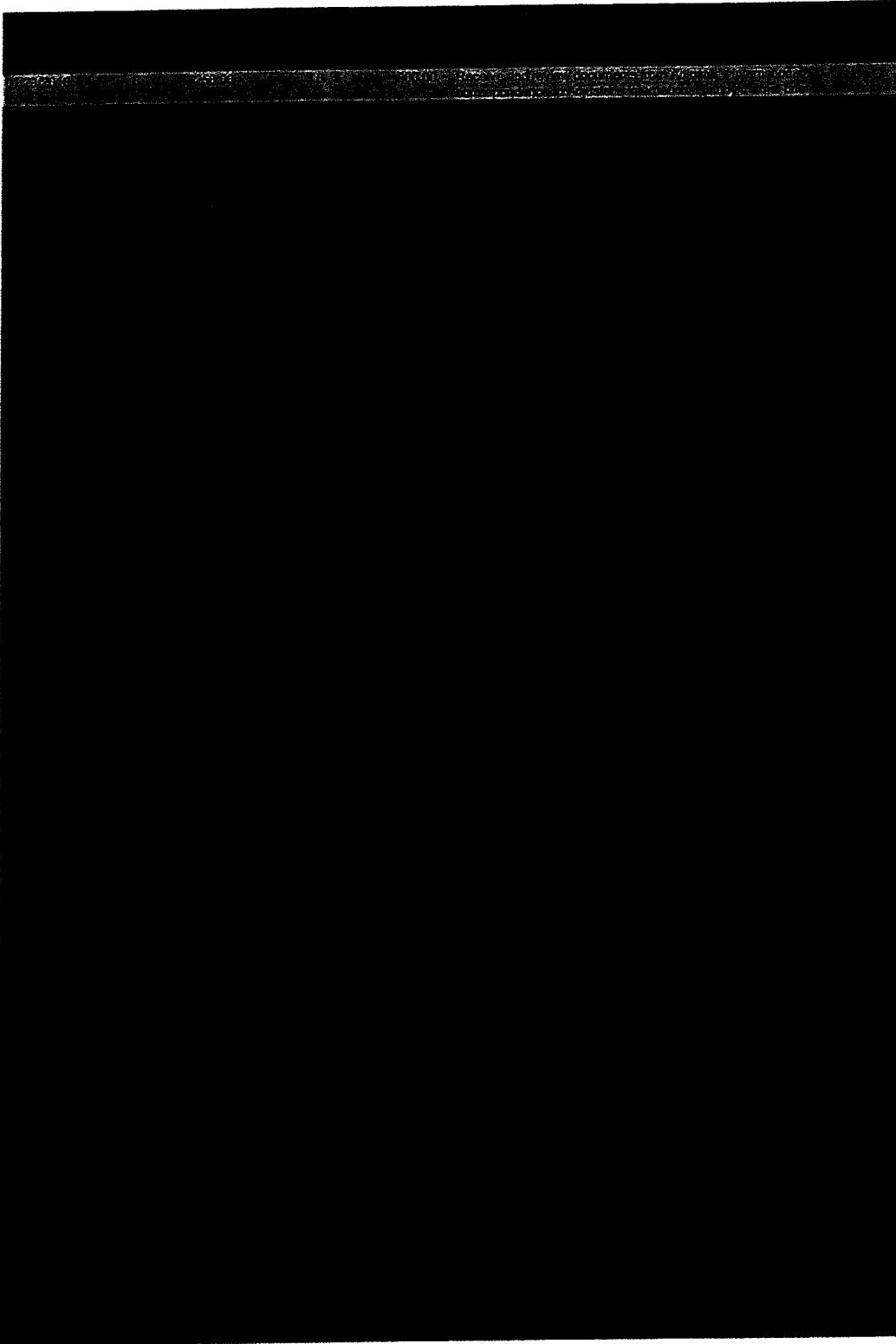


12/02/2015 6 \$266.00 0.9 \$ 225.00 Review/analyze order on summary judgment motion

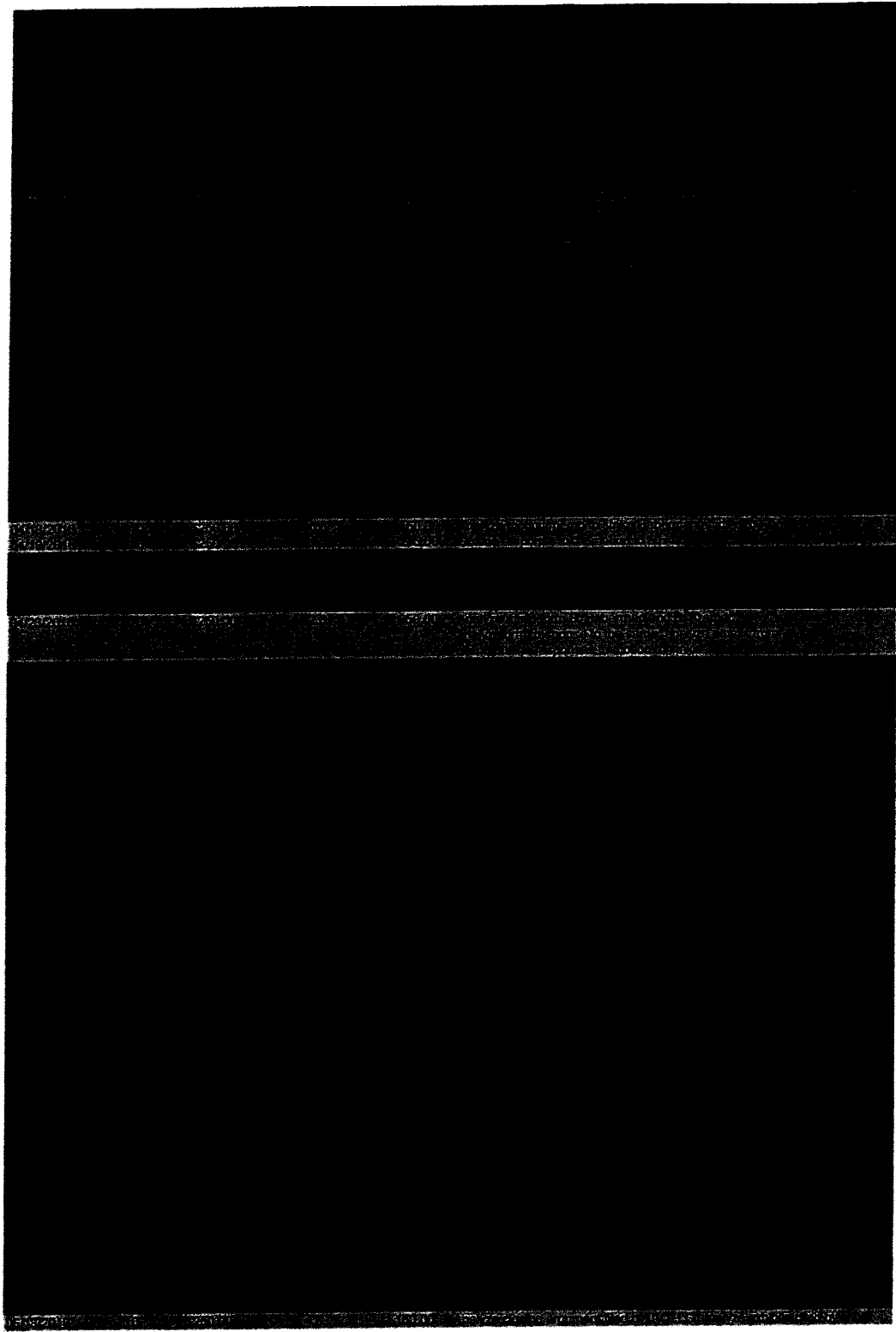


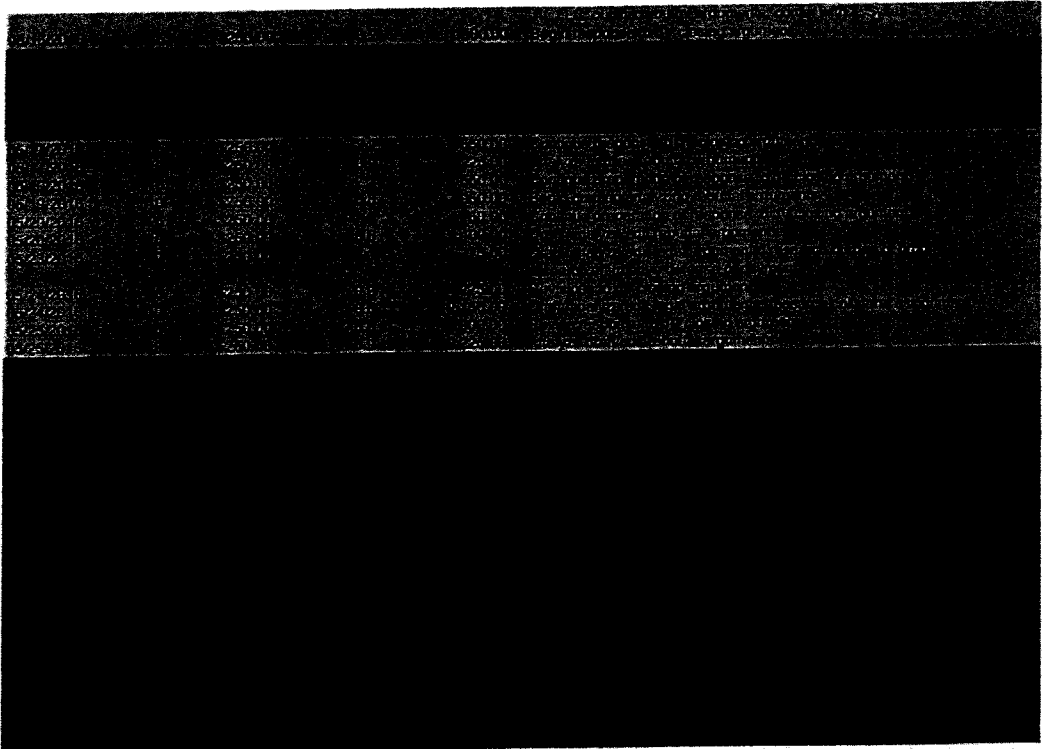












6/23/2016	10	\$250.00	5.6	\$1,400.00	Research fees/costs
6/24/2016	10	\$250.00	6.1	\$1,525.00	Continue researching fees/costs; outline motion for fees and costs; analyze fee/cost invoices; telephone conference with B. Haberman; confer with J. Sykes; compile invoices
6/27/2016	10	\$250.00	6.3	\$1,575.00	Analyze/draft/edit motion for fees/costs
6/28/2016	10	\$250.00	6.7	\$1,675.00	Continue to analyze/draft/edit motion for fees/costs
6/29/2016	10	\$250.00	7.3	\$1,825.00	Continue to analyze/draft/edit motion for fees/costs
6/30/2016	10	\$250.00	7.8	\$1,950.00	Continue to analyze/draft/edit motion for fees/costs
7/1/2016	10	\$250.00	0.5	\$125.00	Analyze email from client; draft changes to proposal; emails and telephone conference with client
7/1/2016	17	\$90.00	5.5	\$90.00	Compile spreadsheets and organize invoices in support of memorandum of costs and fees
7/2/2016	17	\$90.00	11	\$90.00	Segregate spreadsheets and organize invoices in support of memorandum of costs and fees
7/3/2016	17	\$90.00	8.75	\$90.00	Segregate spreadsheets and organize invoices in support of memorandum of costs and fees; incorporate data within memorandum
7/4/2016	17	\$90.00	11.75	\$90.00	Finalize spreadsheets and identification of invoices in support of memorandum of costs and fees
7/5/2016	10	\$250.00	7.1	\$1,775.00	Analyze/draft/finalize motion for fees/costs
7/5/2016	17	\$90.00	8	\$720.00	Finalize work in connection with exhibits to memorandum of costs
Subtotal of Fees			2463.70	\$579,460.50	
<b>GRAND TOTAL:</b>			<b>3196.10</b>	<b>\$726,313.50</b>	

EXHIBIT B

Subsection B-1  
 GENESIS v. POBD and VALIANT  
 FORECLOSURE  
 Fees Attributed to JV

Trans Date	Atty	Rate	Hours to Bill	Amount	
03/22/2013	10	\$250.00	0.9	\$225.00	Analyze JV LLC cross claims; analyze project property records
03/26/2013	10	\$250.00	0.9	\$225.00	Analyze project documents and JV, LLC and real property records email J. Holley
04/02/2013	10	\$250.00	0.7	\$175.00	Analyze JV LLC cross claim, deed of trust and subordination agreement; telephone conference with G. Finney regarding JV LLC crossclaim and stipulation regarding same
04/15/2013	10	\$170.00	1.1	\$187.00	Analyze/draft answer to JV, LLC cross claim
04/15/2013	10	\$170.00	1.1	\$187.00	Analyze JV LLC mortgage, subordination agreements, and other documents referenced in answer and cross-claim
04/16/2013	10	\$170.00	1.1	\$187.00	Analyze/draft answer to JV LLC cross claims
04/17/2013	10	\$170.00	0.9	\$153.00	Analyze/outline affirmative defenses to JV LLC complaint
04/19/2013	10	\$170.00	2.1	\$357.00	Prepare for and attend JV, LLC motion for dismissal on the pleadings
04/19/2013	10	\$170.00	1	\$170.00	Analyze/edit answer to JV LLC cross claim
04/22/2013	10	\$170.00	0.9	\$153.00	Analyze/draft/edit affirmative defenses to JV LLC cross-claim
04/23/2013	10	\$170.00	2.6	\$442.00	Analyze real property records and analyze/draft/edit stipulation to priority of the parties with respect to priority interest of JV, LLC
04/24/2013	10	\$170.00	0.3	\$136.00	Analyze/draft/edit/finalize answer to JV LLC cross-claims and affirmative defenses to same
04/24/2013	10	\$170.00	0.8	\$136.00	Analyze/draft/edit/finalize stipulation to priority of the parties with respect to JV, LLC
04/24/2013	10	\$170.00	0.9	\$153.00	Analyze real property records for exhibits to stipulation to priority of the parties with respect to JV, LLC
04/24/2013	10	\$170.00	0.6	\$102.00	Analyze/draft/edit letter to G. Finney regarding stipulation to priority of the parties with respect to JV, LLC
04/26/2013	10	\$170.00	2.1	\$357.00	Outline discovery to JV, LLC
07/11/2013	10	\$250.00	0.3	\$75.00	Telephone conference with G. Finney regarding potential buyer for property; telephone conference with client regarding the same; email client regarding the same
09/11/2013	10	\$170.00	0.4	\$68.00	Analyze pleadings from G. Finney; analyze pleadings from court
01/20/2014	10	\$250.00	0.9	\$225.00	Telephone conference with G. Finney regarding JV, LLC offer to purchase RE Loans' note; email client (2) Regarding the same; analyze responses from J. Holley and R. Dishnica Regarding the same; analyze email from J. Holley; email J. Holley and R. Dishnica
01/22/2014	10	\$250.00	0.2	\$50.00	Draft/analyze email to client regarding RE Loans note; analyze responses to the same
02/11/2014	10	\$250.00	0.4	\$100.00	Analyze pleadings filed by opposing counsel (JV, LLC)
03/11/2014	10	\$250.00	0.3	\$75.00	Draft letter to G. Finney responding to offer of settlement
03/11/2014	10	\$250.00	1	\$250.00	Analyze case documents to prepare responses to letter from G. Finney
03/11/2014	10	\$250.00	0.8	\$200.00	Draft/analyze letter to G. Finney
03/12/2014	10	\$250.00	0.6	\$150.00	Finalize letter to G. Finney
04/08/2014	10	\$250.00	0.2	\$50.00	Telephone conference with G. Finney regarding tax issues
04/15/2014	10	\$250.00	1.4	\$350.00	Analyze documents and analyze/draft/edit response to letter from G. Finney
04/17/2014	10	\$250.00	0.3	\$75.00	Analyze/edit letter to G. Finney
04/17/2014	10	\$250.00	0.7	\$175.00	Analyze project documents for information necessary to complete letter to G. Finney
04/18/2014	10	\$250.00	0.2	\$50.00	Finalize letter to G. Finney
09/03/2014	10	\$270.00	1.3	\$351.00	Analyze email from G. Edson and attachments; draft and analyze email to G. Edson regarding documents from G. Finney; email client regarding same; draft, analyze and edit email to R. Lynskey; email client regarding same; analyze emails (3) from client; draft and analyze responses to same; confer with paralegal regarding status of summons and deadlines to answer complaint; analyze certificates of service
09/15/2014	10	\$270.00	2.7	\$729.00	Compile and analyze real property records; draft, analyze and edit stipulation to dismiss RC Worst; analyze JV, LLC answer to foreclosure complaint
09/17/2014	10	\$270.00	2.7	\$729.00	Prepare for and participate in hearing to substitute Valiant as the real party in interest for Wells Fargo; analyze answer and counterclaim from Sage Holdings; analyze answer and counterclaim filed by JV, LLC; email client regarding Sage Holdings complaint; analyze response to same
09/18/2014	10	\$270.00	0.6	\$162.00	Analyze memorandum of fees/costs filed by JV, LLC; draft and analyze order for entry of stipulated judgment against RC Worst; email B. Anderson regarding stipulation to judgment and disclaimer of interest
10/02/2014	10	\$270.00	2.9	\$783.00	Analyze/draft/edit answer to JV, LLC complaint; analyze email from counsel for the HOA; analyze/draft/edit response to the same; analyze email from First American re stipulation to judgment
10/06/2014	10	\$270.00	1.9	\$513.00	analyze emails from B. Haberman and respond to the same; analyze email from B. Kramer and respond to the same; UG B. Kramer; analyze email from H. Brooks and respond to the same; research golf course issues; analyze JV answer/cross claim
11/11/2014	10	\$270.00	4.1	\$1,107.00	Analyze emails from client; analyze loan documents; draft/analyze/edit email to client regarding same; analyze pleadings filed by HOA to dismiss JV, LLC's claims; analyze draft stipulation to dismiss; draft/edit stipulation to dismiss and email to counsel for HOA; telephone conference with W. Haberman;

						draft/edit Reeves affidavit
11/14/2014	10	\$270.00	0.5	\$135.00		Telephone conference with T. McLaughlin regarding changes to stipulated judgment; analyze pleadings filed by Panhandle Management to dismiss claims of JV, LLC; exchange email correspondence with client; analyze email from B. Anderson
11/24/2014	10	\$270.00	0.3	\$81.00		Draft/analyze motion to appear telephonically at hearing on HOA's and Panhandle's respective motions to dismiss claims of JV LLC
12/01/2014	8	\$270.00	0.3	\$81.00		Telephone conference with G. Finney regarding JV answer to counterclaim, cross-claim and third party complaint
12/02/2014	10	\$270.00	0.6	\$162.00		Analyze ex parte motion requesting extension; draft opposition stipulating to extension; analyze email from counsel for HOA regarding hearing on motion against JV, LLC
12/09/2014	10	\$270.00	3.7	\$999.00		Draft/analyze reply to JV, LLC's Special Appearance Contesting Jurisdiction; and JV, LLC's Answer to Valiant Idaho, LLC's Counterclaim, Cross-Claim and Third Party Complaint for Judicial Foreclosure; and JV, LLC's Cross-Claim; and JV, LLC's Third Party Complaint; email title company; email counsel for Sage Holding regarding status of stipulation; draft stipulation to judgment against Panhandle Management and the HOA; analyze email response from counsel for Sage Holdings; analyze litigation guarantee regarding Idaho Independent Mortgage and draft/analyze response to the same
12/10/2014	10	\$270.00	1.6	\$432.00		Analyze affirmative defenses; analyze/draft affirmative defenses; telephone conference with B. Anderson regarding status of Sage stip, litigation guarantee and appearance on behalf of HLT and Idaho Independent Mortgage; draft letter to court to withhold order for default against Idaho Independent Mortgage
01/26/2015	6	\$250.00	0.6	\$150.00		Correspondence with J. Finney regarding ACI stipulation to entry of judgment
01/28/2015	10	\$270.00	0.3	\$81.00		Telephone conference with G. Finney regarding motion for additional time, SJ response, and discovery responses (.3)
01/28/2015	10	\$270.00	0.6	\$162.00		Confer with J. Sykes regarding summary judgment issues
01/28/2015	6	\$250.00	0.3	\$75.00		Correspondence with G. Finney, counsel for JV, regarding Rule 56(f) motion
01/28/2015	6	\$250.00	1	\$250.00		Review testimony set forth in Reeves affidavit and discovery requests
01/28/2015	6	\$250.00	0.4	\$100.00		Review IRCP 56(f)
01/29/2015	6	\$250.00	0.4	\$100.00		Telephone conference with with J. Finney regarding ACI
02/04/2015	6	\$250.00	0.5	\$125.00		Review JV's motion for continuance
02/11/2015	6	\$250.00	0.4	\$100.00		Telephone conference with G. Finney regarding discovery and depositions
02/11/2015	6	\$250.00	2.7	\$675.00		Analyze documents for production to JV
02/12/2015	6	\$250.00	0.2	\$50.00		Telephone conference with G. Finney regarding document production
02/13/2015	6	\$250.00	0.2	\$50.00		Telephone conference with G. Finney regarding discovery
02/13/2015	6	\$250.00	0.3	\$75.00		Correspondence with G. Edson regarding deposition of Bonner County Tax Assessor
02/17/2015	6	\$250.00	1.1	\$275.00		Correspondence with G. Finney regarding discovery and continuance
02/18/2015	6	\$250.00	0.2	\$50.00		Correspondence with J. Finney regarding document production
02/23/2015	10	\$250.00	0.6	\$150.00		Review/analyze litigation strategy and timing for depositions of Berry and Vitelli
02/23/2015	10	\$250.00	0.3	\$75.00		Telephone conference with G. Finney regarding deposition scheduling
02/23/2015	10	\$250.00	0.2	\$50.00		Analyze email from G. Edson regarding deposition scheduling
02/23/2015	10	\$250.00	0.2	\$50.00		Telephone conference with G. Edson regarding deposition scheduling
02/24/2015	10	\$270.00	0.3	\$81.00		Analyze default judgments obtained by JV
03/02/2015	10	\$250.00	0.6	\$150.00		Telephone conference with G. Finney regarding depositions
03/02/2015	10	\$250.00	2.7	\$675.00		Analyze documents in preparation for deposition of R. Vitelli
03/03/2015	10	\$250.00	2.3	\$575.00		Analyze documents and prepare for Berry deposition
03/03/2015	10	\$250.00	1.6	\$400.00		Compile and email documents requested by JV and telephone conference with counsel for JV regarding the same
03/04/2015	6	\$250.00	6.2	\$1,550.00		Continue preparation of reply memorandum to JV opposition
03/23/2015	6	\$250.00	1.4	\$350.00		Study JV discovery responses
03/24/2015	6	\$250.00	0.9	\$225.00		Research JV complaint
06/16/2015	15	\$225.00	0.6	\$135.00		Telephone conference with G. Finney regarding Opposition to Motion for Entry of Final Judgment and mediation; confer with J. Sykes & R. Stacey
06/16/2015	6	\$270.00	0.6	\$162.00		Study motion to reconsider
06/16/2015	10	\$270.00	1.7	\$459.00		Analyze email from D. Shafer; confer with C. Nicholson regarding hearing on motion for final judgment
06/16/2015	10	\$250.00	0.2	\$50.00		Telephone conference with G. Finney regarding hearing, mediation and motion to reconsider
06/16/2015	10	\$250.00	1.6	\$400.00		Analyze JV, LLC motion to reconsider
06/16/2015	10	\$250.00	0.2	\$50.00		Email client
06/16/2015	10	\$250.00	2.3	\$575.00		Outline response to JV, LLC motion to reconsider
06/16/2015	10	\$250.00	0.1	\$25.00		Telephone conference with B. Kramer
06/23/2015	10	\$250.00	0.5	\$125.00		Analyze JV LLC motion that was improperly served n March 2015
07/07/2015	10	\$250.00	1.9	\$475.00		Analyze JV objection
07/16/2015	10	\$250.00	2.6	\$650.00		Analyze/research motion to reconsider filed by JV
07/30/2015	10	\$250.00	2.8	\$700.00		Analyze new motion to reconsider priority of JV, LLC
07/30/2015	10	\$250.00	0.2	\$50.00		Analyze/outline response to the same; analyze/draft email to clients
07/30/2015	10	\$250.00	0.1	\$25.00		Analyze responses to the same
07/31/2015	6	\$250.00	1.1	\$275.00		Prepare correspondence to D. Kreifels
07/31/2015	10	\$250.00	2.1	\$525.00		Draft objection to expedited hearing date for 2nd JV motion to reconsider
07/31/2015	6	\$250.00	1.5	\$375.00		Review/analyze file and pleadings
07/31/2015	10	\$270.00	1.1	\$297.00		Analyze email from client and respond to same; telephone conference with court law clerk
08/03/2015	10	\$250.00	2.7	\$675.00		Research objection to 2nd JV motion to reconsider

08/03/2015	10	\$250.00	0.3	\$75.00	Telephone conference with court clerk regarding judge's decision to deny expedited hearing and discussing availability for Sept. 2 hearing date
08/03/2015	10	\$250.00	0.3	\$75.00	Email client regarding the same
08/04/2015	10	\$250.00	0.3	\$75.00	Analyze court order re-noticing hearing of 2nd JV motion to reconsider
08/04/2015	10	\$250.00	0.8	\$150.00	Review 2nd JV motion to reconsider
08/04/2015	10	\$250.00	1.1	\$275.00	Review/analyze memoranda filed by JV
08/04/2015	10	\$250.00	1.3	\$325.00	Outline arguments in opposition to the same
08/12/2015	10	\$270.00	3.8	\$1,026.00	Research legal issues related to foreclosure; study JV motion to reconsider
08/19/2015	15	\$225.00	1.8	\$405.00	Research regarding Rule 90 standard; finalize memo; finalize motion
08/19/2015	5	\$250.00	1.4	\$350.00	Begin preparation for hearing on JV's second/third motions for reconsideration
08/20/2015	10	\$250.00	1.6	\$400.00	Analyze new motion to reconsider filed by JV, LLC
08/20/2015	10	\$250.00	2.1	\$525.00	Research new issues raised by the same and outline arguments in response to the same
08/21/2015	10	\$250.00	2.7	\$675.00	Legal research in support of opposition to motion to reconsider
08/21/2015	10	\$250.00	2.6	\$650.00	Begin analyze/drafting the same
08/24/2015	10	\$250.00	1.4	\$350.00	Outline responsive motion
08/24/2015	10	\$250.00	1.5	\$375.00	Analyze and compare JV's motion to its arguments in prior pleadings
08/24/2015	10	\$250.00	1	\$250.00	Analyze Valiant's responses to the same
08/24/2015	15	\$225.00	2.2	\$495.00	Analysis of JV Motion to Reconsider filed Aug. 18
08/25/2015	15	\$225.00	3.8	\$855.00	Draft Memo. Opp JV's Motion for Reconsideration filed 8/18/15
08/25/2015	10	\$250.00	3.2	\$2,050.00	Analyze/draft/edit opposition to JV's 3rd motion to reconsider
08/26/2015	10	\$250.00	4.7	\$1,175.00	Analyze/edit/draft/finalize opposition to JV's 3rd motion to reconsider
08/26/2015	15	\$225.00	1.2	\$270.00	Revise Memo Opp JV's Motion for Reconsideration filed 8/18/15
08/31/2015	10	\$270.00	3.1	\$837.00	Analyze/edit reply memorandums; analyze JV's motions and supporting memoranda and Valiant's opposition memoranda in preparation for hearing
08/31/2015	15	\$225.00	0.5	\$112.50	Analysis of JV reply in support of its 3rd and 4th motions to reconsider; Analysis of JV Supplemental Motion to Reconsider
08/31/2015	10	\$250.00	1.1	\$275.00	Review/analyze supplemental motion to reconsider, siter and amend filed on August 26
08/31/2015	10	\$250.00	0.7	\$175.00	Outline strategy
08/31/2015	10	\$250.00	1.1	\$275.00	Analyze reply to Valiant's opposition to JV's motion to alter, amend, and reconsider
08/31/2015	10	\$250.00	0.6	\$150.00	Outline strategy
09/01/2015	6	\$250.00	3.8	\$950.00	Study pleadings in preparation for hearing on motion for reconsideration
09/08/2015	10	\$250.00	0.5	\$125.00	Analyze JV's request for hearing transcript
09/08/2015	10	\$250.00	1.3	\$325.00	Analyze court's memorandum decision and order granting JV's motion to reconsider in part and denying it in part
09/09/2015	10	\$250.00	2.4	\$600.00	Analyze court memorandum decision and pleadings for and against JV motion to reconsider
09/09/2015	10	\$250.00	1.1	\$275.00	Email clients
09/09/2015	10	\$250.00	1.3	\$325.00	Analyze court decision
09/15/2015	10	\$250.00	3.1	\$775.00	Analyze/outline/draft opposition to JV's proposed judgment
09/15/2015	10	\$250.00	1.2	\$300.00	Analyze documents and pleadings related to the same
09/16/2015	10	\$250.00	1.1	\$275.00	Finalize opposition to proposed JV judgment
10/07/2015	10	\$250.00	1.6	\$400.00	Analyze/draft/edit interrogatories to JV, LLC
10/07/2015	10	\$250.00	3.1	\$775.00	Analyze project documents and pleadings for discovery issues related to JV
10/08/2015	15	\$195.00	1.7	\$331.50	Research use of deposition in other matter under Idaho and FRCP 32(a)
10/08/2015	10	\$250.00	1.1	\$275.00	Analyze/draft/edit interrogatories to JV
10/09/2015	10	\$250.00	1.6	\$400.00	Finalize discovery requests to JV
10/14/2015	10	\$250.00	1.5	\$375.00	Analyze JV's motion for summary judgment and supporting affidavits
10/18/2015	15	\$195.00	0.2	\$39.00	Analysis of Finney Affi & JV's Motion to Vacate 10/23 hearing
10/18/2015	15	\$195.00	0.3	\$58.50	Analysis of Berry Affi Opp 3rd SJ Motion
10/18/2015	15	\$195.00	0.8	\$156.00	Analysis of JV's Opp to 3rd SJ Motion
10/19/2015	10	\$250.00	2.6	\$650.00	Analyze/draft/edit reply to objection filed by JV, LLC
10/19/2015	10	\$250.00	1.9	\$475.00	Draft/analyze/edit objection to motion for extension filed by JV, LLC
10/19/2015	10	\$250.00	0.2	\$50.00	Email G. Finney regarding deposition of JV
10/19/2015	15	\$195.00	0.2	\$39.00	Draft Motion Shorten Time Re Second Motion to Strike
10/20/2015	15	\$195.00	3.4	\$663.00	Draft Reply to JV's Opp to Valiant's 3rd SJ Motion
10/20/2015	15	\$195.00	1.9	\$370.50	Draft Opp to JV's Motion to Vacate 3rd SJ Hearing
10/20/2015	10	\$250.00	2.4	\$600.00	Draft/analyze/edit/research reply to objection filed by JV, LLC
10/20/2015	10	\$250.00	1.7	\$425.00	Analyze purchase money mortgage
10/20/2015	10	\$250.00	1.1	\$275.00	Analyze possible statute of limitations issues
10/21/2015	15	\$195.00	1.2	\$234.00	Reply to JV's Opp to Valiant's First Motion to Strike
10/21/2015	10	\$250.00	1.9	\$475.00	Analyze last minute briefing filed by opposing counsel with affidavits and motions to shorten time
10/21/2015	18	\$100.00	1.1	\$110.00	Review Declarations for Motion To Strike regarding Business Record Exemption
10/26/2015	15	\$195.00	2.6	\$507.00	Analysis of JV discovery responses and draft meet and confer
10/27/2015	10	\$250.00	0.2	\$50.00	Analyze email from G. Finney regarding deposition dates for JV
11/24/2015	15	\$195.00	0.9	\$175.50	Draft/revise Meet & Confer Letter to G. Finney to address JV's most recent discovery responses
12/15/2015	10	\$250.00	4.7	\$1,175.00	Analyze First American documents; analyze email from C. Reeves; analyze/draft/edit motions in limine and affidavit in support of the same; confer/Streamline imaging regarding document production and coordinate the same; draft/analyze/edit responses to JV interrogatories
12/24/2015	10	\$250.00	5.3	\$1,325.00	Continue analyzing Valiant/Pensco/MF08 documents; analyze JV, LLC's opposition to Valiant's motions in limine; outline reply to the same
01/18/2016	10	\$250.00	3.2	\$2,050.00	Analyze trial exhibits from JV, LLC; prepare for trial; analyze research on admissibility of depositions; confer

01/23/2016	6	\$250.00	3.6	\$900.00	with C. Nicholson regarding research; email to B. Ng; analyze documents produced by C. Reeves;
04/18/2016	10	\$250.00	0.6	\$150.00	confer with J. Sykes regarding Reeves and Brule depositions; analyze deposition exhibits; otherwise prepare for trial
04/19/2016	10	\$250.00	1.1	\$275.00	Receive and review documents from Adjuster's International; correspondence to Adjuster's International; study JV trial brief
04/23/2016	10	\$250.00	2.6	\$650.00	Analyze motion/memo to strike Haberman affidavit by JV
					Outline response to JV motion to strike
					Analyze mails from B. Haberman and B. Kramer; analyze/draft response to the same; analyze emails from client; outline responses to motion to strike
05/13/2016	10	\$250.00	4.3	\$1,150.00	Analyze closing argument filed by JV, LLC; analyze exhibits cited by JV, LLC; outline rebuttal arguments; confer with J. Sykes
05/16/2016	6	\$250.00	3.2	\$800.00	Begin response to JV closing argument
05/17/2016	6	\$250.00	2.2	\$550.00	Continue response to JV closing argument
05/17/2016	10	\$250.00	0.9	\$225.00	Analyze /outline rebuttal arguments
05/19/2016	6	\$250.00	2.2	\$550.00	Continue preparation of response to JV closing argument
05/19/2016	10	\$250.00	3.8	\$950.00	Begin drafting/analyzing rebuttal arguments
05/20/2016	6	\$250.00	3	\$750.00	Continue preparation of response to JV closing argument
05/20/2016	10	\$250.00	5.6	\$1,400.00	Draft /analyze/edit rebuttal arguments
05/23/2016	10	\$250.00	7.1	\$1,775.00	Draft /analyze/edit legal arguments; research burden of proof; research affirmative defense of payment
05/24/2016	6	\$250.00	0.9	\$225.00	Revisions to JV closing argument
05/24/2016	10	\$250.00	8.6	\$2,150.00	Draft /analyze/edit legal arguments; research collateral assignment
05/25/2016	6	\$250.00	3.6	\$900.00	Revise response to JV closing argument
05/25/2016	10	\$250.00	8.9	\$2,225.00	Analyze draft/edit rebuttal arguments
<b>Subtotal of Fees</b>			<b>282.50</b>	<b>\$68,863.50</b>	

**Subsection B-2  
VALIANT FORECLOSURE**  
Fees Attributed Jointly to JV and VP

Trans Date	Atty	Rate	Hours to Bill	Amount	
11/11/2015	10	\$250.00	1.3	\$325.00	Analyze FATCO documents
11/11/2015	10	\$270.00	0.2	\$54.00	Analyze letter from FATCO
11/12/2015	10	\$250.00	4.3	\$1,200.00	Analyze FATCO and documents; analyze emails from B. Ng.
11/12/2015	10	\$250.00	0.3	\$75.00	Telephone conference with client
11/13/2015	10	\$250.00	3.1	\$775.00	Continue to analyze FATCO documents
11/13/2015	10	\$250.00	0.4	\$100.00	Analyze email from client
11/13/2015	10	\$270.00	0.6	\$162.00	Analyze emails from FATCO and Dean Shafer; telephone conference with D. Shafer
11/16/2015	10	\$270.00	0.3	\$81.00	Analyze emails from D. Shafer and respond to the same
11/16/2015	15	\$195.00	0.6	\$117.00	Review of JV Discovery responses to Irogs 13-23 and RFPs 7-20 (0.1); review of NIR Answers to Irogs 13-23 and RFPs 7-20 (0.1)
11/16/2015	10	\$250.00	1.6	\$400.00	Analyze Sandpoint Title documents; analyze emails from C. Reeves
11/16/2015	10	\$250.00	0.2	\$50.00	Email C. Reeves regarding deposition
11/16/2015	10	\$250.00	5.2	\$1,300.00	Analyze discovery responses from VP and JV, LLC; analyze documents from C. Reeves; confer with title company; analyze document from title company
11/17/2015	10	\$250.00	5.9	\$1,475.00	Analyze Sandpoint Title and C. Reeves documents
11/18/2015	10	\$250.00	4.1	\$1,025.00	Analyze C. Reeves documents
11/18/2015	6	\$250.00	0.5	\$125.00	Continue evaluation of possible mediation options
11/18/2015	10	\$270.00	2.3	\$621.00	Analyze complaint filed against interests of RE Loans, MF08 and Penaco Trust; draft email to First American; draft email to Fidelity; analyze emails from D. Shafer and M. Hathaway
11/19/2015	10	\$270.00	0.9	\$243.00	Analyze multiple emails from D. Shafer; telephone conference with D. Shafer regarding the same; analyze emails from FATCO regarding the same; analyze exhibit from D. Shafer
11/20/2015	10	\$250.00	2.6	\$650.00	Analyze agreements between Valiant and POBD/Reeves
11/20/2015	10	\$250.00	0.7	\$175.00	Draft/analyze/edit letter to Reeves
11/23/2015	6	\$250.00	1.7	\$425.00	Correspondence with D. Kreifels
11/24/2015	10	\$250.00	3.6	\$900.00	Compile documents to produce to opposing counsel
11/25/2015	10	\$250.00	1.5	\$375.00	Telephone conference with G. Finney and S. Weeks regarding depositions and mediation
11/26/2015	10	\$270.00	0.3	\$81.00	Draft/analyze/edit email First American regarding mediation
11/30/2015	6	\$250.00	0.9	\$225.00	Review/analyze trial witness disclosures and discovery responses
12/01/2015	10	\$250.00	4.1	\$1,025.00	Continue to analyze documents for confidential and privileged information; analyze email from D. Kreifels; telephone conference with D. Kreifels; coordinate document production with S. Sawyer
12/01/2015	6	\$250.00	2.1	\$525.00	Correspondence with D. Kreifels
12/02/2015	10	\$250.00	3.4	\$850.00	Draft/analyze/edit email to opposing counsel regarding discovery responses; draft/analyze and edit emails to C. Reeves and B. Ng regarding depositions; draft/analyze/edit email to D. Marice regarding First American deposition; draft/analyze/edit protective order; email the same to opposing counsel
12/14/2015	6	\$250.00	0.7	\$175.00	Correspondence with D. Kreifels
12/04/2015	10	\$250.00	5.4	\$1,350.00	Analyze documents from client; analyze Fidelity correspondence; respond to the same; email S. Weeks and G. Finney

12/04/2015	10	\$250.00	1.9	\$475.00	regarding confidentiality agreement Email S. Weeks and G. Finney regarding deposition of C. Reeves; draft/analyze/edit deposition notice for C. Reeves; email C. Reeves regarding deposition; coordinate location of deposition with Reno law firm; email B. Ng regarding deposition
12/07/2015	10	\$270.00	1.5	\$432.00	Prepare for and participate in conference call with client; analyze client documents for production
12/07/2015	6	\$270.00	0.8	\$216.00	Telephone conference with clients
12/07/2015	10	\$250.00	0.8	\$200.00	Analyze email from client; email opposing counsel canceling deposition of C. Reeves; analyze email from G. Finney regarding confidentiality agreement; analyze supplemental expert witness disclosure; telephone conference with S. Sawyer regarding documents; email S. Sawyer; analyze email from M. Hathaway and respond to same
12/08/2015	10	\$250.00	2.5	\$650.00	Analyze email from M. Hathaway; telephone conference with M. Hathaway; analyze client documents; telephone conference with S. Sawyer
12/09/2015	10	\$250.00	4.1	\$1,025.00	Draft/analyze letter re opposing counsel regarding confidentiality agreement and Valiant documents (0.6); analyze/identify consulting agreement and consent to judgment (1.1); analyze email from client (0.3); analyze client documents (2.1)
12/09/2015	6	\$250.00	2.9	\$725.00	Correspondence and tel con with D. Penny; provide requested docs
12/10/2015	10	\$250.00	0.3	\$75.00	Analyze email from B. Haberman and email B. Haberman regarding the same
12/11/2015	10	\$250.00	3.3	\$825.00	Telephone conference with B. Haberman; analyze client documents
12/11/2015	6	\$250.00	0.3	\$75.00	Telephone conference with W. Haberman
12/13/2015	10	\$250.00	3.9	\$975.00	Analyze client emails/attachments
12/14/2015	10	\$250.00	2.9	\$725.00	Analyze client emails and coordinate production of non-confidential information; email B. Ng and C. Reeves requesting deposition availability; analyze email from Fidelfly; analyze Saga Holdings' claims
12/14/2015	15	\$195.00	7.6	\$1,482.00	Research regarding and draft Motions in Limine
12/15/2015	15	\$195.00	5	\$975.00	Revisions to Motions in Limine regarding VP and NIR; draft Nicholson Declaration in Support of Motions in Limine (1.4); draft Memorandum Support of Motion in Limine regarding JV (2.2); draft motion in Limine regarding NIR & VP (0.3); draft Motion in Limine regarding JV (0.2); draft Declaration of RLS
12/16/2015	10	\$250.00	5.2	\$1,300.00	Analyze First American documents
12/18/2015	10	\$250.00	3.1	\$775.00	Prepare for and attend pretrial conference telephonically; telephone conference with B. Haberman; confer with J. Sykes
12/18/2015	6	\$250.00	1.8	\$450.00	Correspondence and telephone conference with D. Penny; provide additional documents requested by D. Penny
12/21/2015	10	\$250.00	5.6	\$1,400.00	Calculate estimated attorney fees through trial and email the same to attorney for First American Title; confer with C. Nicholson regarding trial deadlines for briefing; compile FATCO documents; email the same to Streamline imaging; email D. Marfice regarding FATCO deposition; analyze filing deadlines for replies to oppositions to motions in Limine and rules regarding the same; analyze/identify and compile trial exhibits; edit litigation outlines
12/22/2015	10	\$250.00	5.2	\$1,300.00	Analyze letter from First American; analyze/edit/draft email to clients; analyze client response; analyze C. Reeves documents; draft deposition notices for R. Lynskey and C. Linscott
12/28/2015	10	\$250.00	3.3	\$825.00	Confer with C. Nicholson regarding hearing; analyze email from client; respond to same; telephone conference with clients; emails to opposing counsel regarding availability of expert for deposition
12/28/2015	15	\$195.00	4.6	\$897.00	Finish drafting response in support of motion in Limine regarding VP/NIR (3.4); draft response in support of motion in Limine regarding JV (1.2)
12/28/2015	6	\$250.00	1.1	\$275.00	Review and revise motion in limine reply memoranda
12/29/2015	10	\$250.00	2.8	\$700.00	E-mail C. Reeves and B. Ng regarding depositions of the same; telephone conference with C. Reeves and B. Ng regarding the same; email First American regarding depositions of C. Linscott and R. Lynskey; analyze response to the same; draft deposition notices for C. Reeves and B. Ng; analyze/edit casemap outlines
12/29/2015	15	\$195.00	11	\$2,145.00	Preparation for (1.5), travel to/from (8.4), and attend (1.3) motion in Limine hearing
12/30/2015	10	\$250.00	6.7	\$1,675.00	Confer with J. Sykes regarding deposition availability; telephone conference with C. Reeves and B. Ng; edit deposition notices pursuant to the same; email S. Weeks and G. Finney regarding proposed deposition dates; analyze calendar and email S. Weeks availability for depositions through dates; emails to and from Streamline imaging regarding document blowups and production of documents to opposing counsel; analyze FATCO documents and identify documents that need to be blown up for use at depositions and trial
12/30/2015	6	\$250.00	2.2	\$550.00	Review correspondence from D. Penny; begin trial preparation; research evidence issues; confer with R. Stacey regarding trial preparation
12/31/2015	10	\$250.00	5.2	\$1,300.00	Continue to identify FATCO documents that need to be blown up for trial; analyze/identify trial exhibits; draft/analyze casemap outlines in preparation for trial; analyze court order regarding motions in limine; confer with C. Nicholson regarding the same
01/04/2016	6	\$250.00	0.6	\$150.00	Begin preparation for deposition of C. Reeves
01/04/2016	10	\$250.00	9.7	\$2,425.00	Analyze/draft/edit exhibit list and compile and analyze trial exhibits
01/05/2016	6	\$250.00	1.1	\$275.00	Review and revise trial exhibit list
01/05/2016	10	\$250.00	3.7	\$925.00	Analyze/identify/compile deposition exhibits; analyze/edit trial exhibit list

01/06/2016	6	\$250.00	1.2	\$300.00	Continue preparation for deposition of C. Reeves
01/06/2016	10	\$250.00	6.3	\$1,575.00	Outline questions and otherwise prepare for depositions of C. Linscott and R. Lynskay; telephone conference with clients
01/07/2016	6	\$250.00	0.4	\$100.00	Correspondence regarding property vesting deeds
01/07/2016	6	\$250.00	0.9	\$225.00	Multiple correspondence with C. Reeves
01/07/2016	6	\$250.00	1.9	\$475.00	Continue preparation for C. Reeves deposition
01/07/2016	6	\$250.00	0.9	\$225.00	Review amended notices of deposition of Reeves and Ng
01/07/2016	10	\$250.00	10.7	\$2,675.00	Travel to Sandpoint, Idaho (4.1); attend and participate in depositions of C. Linscott and R. Lynskay (5.3); travel to Spokane, WA. (1.3)
01/08/2016	6	\$250.00	4.2	\$1,050.00	Confer with R. Stacey regarding information needed from Ng and Reeves; prepare trial exhibits; prepare outline for Reeves deposition and trial testimony; telephone conference with C. Reeves regarding deposition
01/08/2016	10	\$250.00	10.9	\$2,725.00	Travel from Boise to Spokane; telephone conference with B. Ng; telephone conf with clients; multiple telephone conference with S. Weeks coordinating the rescheduling of depositions of C. Reeves and A. Brule; telephone conference with S. Weeks regarding same; analyze Ng depo topics; analyze and edit trial exhibit list and trial exhibits
01/09/2016	10	\$250.00	2.1	\$525.00	Research/analyze wrap mortgages
01/10/2016	10	\$250.00	5.7	\$1,425.00	Analyze exhibits and exhibit lists; analyze/identify all recorded documents to obtain certified copies; analyze exhibits and prepare for deposition of B. Ng
01/11/2016	6	\$250.00	6.2	\$1,550.00	Multiple telephone conferences with C. Reeves; telephone conference with S. Weeks regarding depositions; correspondence to counsel regarding deposition changes; study Valiant documents for Reeves deposition; prepare for Brule deposition; examine deeds from Pend Oreille Bonner Development Holdings, Inc. to Pend Oreille Bonner Development for trial exhibits
01/11/2016	15	\$195.00	3.2	\$624.00	Begin drafting pre-trial memorandum; research holding in due course status
01/11/2016	10	\$250.00	11.7	\$2,925.00	Analyze supplemental expert disclosure; outline deposition questions; analyze documents and otherwise prepare for the deposition of B. Ng; edit/analyze exhibit list; travel to Oakland, CA. for deposition
01/11/2016	18	\$100.00	0.3	\$30.00	Pull Law Review Articles
01/12/2016	15	\$195.00	1.5	\$292.50	Discuss deposition A. Brule;
01/12/2016	10	\$250.00	11.6	\$2,900.00	Attend and participate in deposition of B. Ng; travel from Oakland, CA to Boise, Idaho; telephone conference with B. Haberman
01/12/2016	18	\$100.00	0.5	\$50.00	Pull Law Review Articles
01/12/2016	18	\$100.00	1.4	\$140.00	Research admission of certified docs; articles of org; and self-authentication; email regarding research
01/12/2016	6	\$250.00		\$0.00	Continue preparing for A. Brule and C. Reeves depositions; travel to ODA Idaho
01/13/2016	10	\$250.00	4.8	\$1,200.00	Telephone conference with B. Haberman and B. Kramer; confer with J. Sykes; analyze depo exhibits for C. Reeves; compile additional exhibits for C. Reeves deposition; outline questions for A. Brule deposition and confer with J. Sykes regarding the same
01/13/2016	18	\$100.00	1.3	\$130.00	Research admission of certified documents; articles of origin; self-authentication; email regarding research
01/13/2016	6	\$250.00		\$0.00	Continue prep for Brule deposition; continue prep; travel to Spokane; telephone conference with clients
01/14/2016	10	\$250.00	4.8	\$1,200.00	Telephone conference with D. Penny; draft/analyze letter to D. Penny and First American; draft/analyze trial subpoenas and letters to C. Linscott and R. Lynskay; draft/analyze letter to D. Marice regarding the same; analyze/adult/finalize exhibit list; analyze trial exhibits for production; analyze/draft/edit witness list
01/14/2016	18	\$100.00	3.5	\$350.00	Research certification of business records
01/14/2016	18	\$100.00	2.5	\$250.00	Research certification of business records; email re same
01/14/2016	6	\$250.00	9.3	\$2,450.00	Attend deposition of Annette (Tony) Brule; prepare for Chuck Reeves for deposition; telephone conference with client
01/15/2016	6	\$250.00	11	\$2,750.00	Attend deposition of Chuck Reeves; travel to Spokane, WA; study deposition exhibits; telephone conference with R. Stacey
01/16/2016	6	\$250.00	4	\$1,000.00	Return to Boise
01/16/2016	6	\$250.00	1	\$250.00	Correspondence to obtain documents re insurance
01/18/2016	15	\$195.00	2.8	\$546.00	Continue drafting pre-trial brief and research regarding pre-trial brief
01/19/2016	18	\$100.00	2.9	\$290.00	E-mail regarding certification of Wells Fargo Records; Bonner county records; research regarding burden of proof/burden of evidence; telephone conference with Wells Fargo rep
01/20/2016	10	\$250.00	3.1	\$775.00	Analyze/finalize trial brief; analyze research; research hearsay exceptions
01/20/2016	18	\$100.00	3.5	\$350.00	Telephone conference with Wells Fargo; research regarding legally operative fact exception
01/20/2016	6	\$250.00	7.2	\$1,800.00	Letter to D. Penny; telephone conference with Chuck Reeves; review document from C. Reeves; update trial exhibits; revise trial brief; review JV Exhibit List and VP Exhibit List; telephone conference with Greenspan/Adjuster's International
01/21/2016	10	\$250.00	7.9	\$1,975.00	Meeting with J. Sykes; analyze documents and amend exhibit lists; analyze rules of evidence; analyze VP documents; telephone conference with D. Kreitman; confer w C. Tipton; email H. Spector; analyze response research untruthful acts subject to extrinsic evidence
01/21/2016	18	\$100.00	2.3	\$290.00	Research legally operative fact; research IRE 303(15); email/phone call regarding affidavit
01/21/2016	6	\$250.00	5.3	\$1,325.00	Review and revise documents; create new trial exhibits; revise trial brief
01/22/2016	10	\$250.00	5.5	\$1,850.00	Analyze deposition transcripts; compile documents/exhibit binders to



01/22/2016	6	\$250.00	6.3	\$1,575.00	ship to Sandpoint; identify equipment to ship to Sandpoint; confer with IT company regarding the same; analyze email from H. Spector; confer with C. Tipton; analyze deposition exhibits
01/24/2016	10	\$250.00	6.7	\$1,875.00	Continue preparing for trial; study trial exhibits; telephone conference with Chuck Reeves; conference with Adjuster's International; begin review of Brule and Reeves deposition transcripts
01/24/2016	18	\$100.00	0.4	\$40.00	Prepare for trial
01/24/2016	6	\$250.00	3.9	\$975.00	E-mail regarding cross complaint; follow-up records affidavit
01/25/2016	15	\$195.00	0.7	\$136.50	Trial preparation; prepare new exhibit 65; telephone conference with Chuck Reeves; prepare direct exam of Chuck Reeves
01/25/2016	10	\$250.00	9.8	\$2,450.00	Draft memoranda of law
01/25/2016	6	\$250.00	4.2	\$1,050.00	Prepare for trial
01/26/2016	10	\$250.00	13.1	\$3,275.00	Continue trial preparation; review Deeds of Trust; finalize Exhibit 65A; conference with P. DeAngeli
01/26/2016	6	\$250.00	14	\$3,500.00	Travel from Boise to Sandpoint; telephone conference with client; analyze exhibits and direct testimony; trial preparation
01/27/2016	15	\$195.00		\$0.00	Travel to Sandpoint, Idaho; trial preparation
01/27/2016	10	\$250.00	14.3	\$3,575.00	Deal with original exhibit issues (1,4); review VP's Motion to Amend
01/27/2016	8	\$250.00	10.5	\$2,625.00	Meeting with B. Ng; meeting with C. Linscott; meet with client; otherwise prepare for trial
01/29/2016	15	\$195.00	3.4	\$663.00	Trial preparation; prepare trial examination; telephone call to witness identified by JV and VP; meet Bill Haberman
01/29/2016	10	\$250.00	14.7	\$3,675.00	Research and revise memoranda regarding depositions and res judicata effect; review loan documents
01/29/2016	6	\$250.00	12.5	\$3,125.00	Attend trial; argue opposition to motion to amend; prepare for opening statements; meet with witness; meet with witness; trial preparation
01/29/2016	15	\$195.00	1.5	\$292.50	Trial preparation for second day of trial
01/29/2016	10	\$250.00	9.8	\$2,450.00	Review documents; review Finney offer to purchase; telephone conference with and email to Phil DeAngeli
01/29/2016	6	\$250.00	11	\$2,750.00	Prepare for trial; attend trial; redirect examination of B. Ng; direct examination of C. Linscott; redirect examination of C. Linscott
01/30/2016	10	\$250.00	3.9	\$975.00	Second day of trial
01/30/2016	6	\$250.00	7	\$1,750.00	Box exhibits, documents, binders, etc and mail to Boise, ID; travel from Sandpoint to Boise, ID
02/01/2016	10	\$250.00	4.1	\$1,025.00	Meet with Bill Haberman; travel to Boise
02/01/2016	6	\$250.00	0.2	\$50.00	Analyze status of trial;
02/04/2016	10	\$250.00	3.1	\$775.00	telephone conference with D. Penny
02/05/2016	10	\$250.00	2.1	\$525.00	Telephone conference with D. Penny
02/05/2016	6	\$250.00	0.5	\$125.00	Analyze boxes from Sandpoint and verify everything was received from UPS
02/08/2016	10	\$250.00	2.1	\$525.00	Analyze email from client and respond to the same; analyze trial notice; outline issues for on redirect
02/08/2016	6	\$250.00	0.8	\$200.00	Correspondence with D. Penny; correspondence with court reporter and counsel regarding transcript
02/16/2016	10	\$250.00	6.1	\$1,525.00	Analyze pleadings for potential default issues; analyze email from client; draft/analyze response to same; confer with J. Sykes
02/18/2016	10	\$250.00		\$0.00	Correspondence regarding chain of title
02/21/2016	10	\$250.00	3.8	\$950.00	Analyze email from client; analyze email and letters from First American; analyze/draft email to P. DeAngeli; analyze response to same; analyze email from court reporter; analyze client documents; analyze Reeves documents
02/23/2016	10	\$250.00	5.1	\$1,275.00	Analyze email from P. DeAngeli
02/29/2016	6	\$250.00	4.4	\$1,100.00	Prepare for conference calls with B. Haberman and C. Reeves;
03/01/2016	6	\$250.00	4.2	\$1,050.00	telephone conference with B. Haberman;
03/01/2016	10	\$250.00	3.1	\$775.00	telephone conference with C. Reeves;
03/03/2016	6	\$250.00	2.2	\$550.00	analyze Eagle Point documents; telephone conference with client; confer with J. Sykes
03/04/2016	6	\$250.00	2.1	\$525.00	Analyze exhibits
03/07/2016	6	\$250.00	0.3	\$75.00	Study Eagle Pointe deeds
03/07/2016	10	\$250.00	5.2	\$1,300.00	Prepare trial testimony; correspondence with C. Reeves;
03/08/2016	10	\$250.00	2.9	\$725.00	correspondence to P. DeAngeli; review Eagle Pointe documents
03/09/2016	18	\$100.00	1.6	\$160.00	Analyze emails from client and respond to the same; analyze documents; analyze Eagle Pointe issues;
03/09/2016	10	\$250.00	4.9	\$1,225.00	analyze FATCO documents; analyze trial issues
03/10/2016	18	\$100.00	2.1	\$210.00	Telephone conference with client; continue preparation of trial testimony
03/10/2016	10	\$250.00	5.7	\$1,425.00	Prepare additional documents for review
03/11/2016	10	\$250.00	5.1	\$1,275.00	Review correspondence from client
03/12/2016	6	\$250.00	2.1	\$525.00	Prepare for trial
03/13/2016	10	\$250.00	4.3	\$1,075.00	Prepare for trial
03/14/2016	6	\$250.00	4.7	\$1,175.00	Research paying down of lien
03/14/2016	18	\$100.00	2.1	\$210.00	Prepare for trial
03/14/2016	10	\$250.00	5.7	\$1,425.00	Research pay down of lien
03/15/2016	6	\$250.00	12	\$3,000.00	Prepare for trial
03/15/2016	10	\$250.00	14.1	\$3,525.00	Prepare for trial
03/16/2016	6	\$250.00	12	\$3,000.00	Travel to Sandpoint and prepare for trial; interview C. Reeves
					Travel to Sandpoint, ID from Boise, ID; meet with B. Haberman;
					meet with C. Reeves; prepare for trial
					Attend trial; prepare for next day of trial

03/16/2016	10	\$250.00	13.4	\$3,350.00	Prepare for trial; attend trial; prepare for trial on following day
03/17/2016	6	\$250.00	11	\$2,750.00	Attend last day of trial; meet with client and witnesses
03/17/2016	18	\$100.00	0.8	\$80.00	Review Discovery to identify rebuttal exhibit
03/17/2016	10	\$250.00	11.1	\$2,775.00	Prepare for trial; attend trial; meeting with client
03/17/2016	15	\$195.00	0.7	\$138.50	Review loan documents
03/18/2016	6	\$250.00	5.5	\$1,625.00	Return to Boise from Sandpoint
03/18/2016	10	\$250.00	4.3	\$1,075.00	Travel to Boise, Idaho from Sandpoint, Idaho
03/21/2016	10	\$250.00	3.2	\$800.00	Analyze/outline trial testimony; confer with J. Sykes
03/28/2016	6	\$250.00	0.1	\$25.00	Telephone conference with D. Penny
03/30/2016	6	\$250.00	0.2	\$50.00	Correspondence with D. Penny
04/01/2016	10	\$250.00	1.8	\$400.00	Analyze/draft rough outline for closing argument
04/04/2016	10	\$250.00	6.4	\$1,800.00	Begin analysis of admitted exhibits for closing arguments; begin legal research in support of closing argument; begin outlining closing argument
04/05/2016	10	\$250.00	1.4	\$350.00	Continue analysis exhibits
04/11/2016	10	\$250.00	6.5	\$1,625.00	Analyze/edit/finalize written closing argument
04/12/2016	10	\$250.00	7.1	\$1,775.00	Draft/analyze/edit written closing argument; analyze admitted exhibits
04/13/2016	10	\$250.00	6.8	\$1,700.00	Draft/analyze/edit written closing argument; analyze admitted exhibits; research legal issues; analyze/draft/finalize affidavit of B. Haberman; analyze spreadsheets; analyze/draft email to client; analyze amended spreadsheets
04/13/2016	15	\$195.00	0.9	\$175.50	Review discovery responses in support of closing argument
04/13/2016	18	\$100.00	0.3	\$30.00	Research regarding Bonner County Local Rules
04/14/2016	10	\$250.00	6.1	\$1,525.00	E-mail draft closing argument to client; analyze emails from client; draft/analyze/finalize written closing argument; analyze/finalize affidavit of B. Haberman
04/21/2016	10	\$250.00	2.4	\$600.00	Several emails to D. Shafer; analyze responses to same
04/22/2016	10	\$250.00	4.3	\$1,075.00	Analyze spreadsheet identifying lots; verify all lots described in Exhibit 30; email Bonner County tax assessor; analyze emails from D. Shafer
04/25/2016	10	\$250.00	3.1	\$775.00	Analyze information from D. Shafer; analyze trial exhibits; telephone conference with C. Piehl; email to C. Piehl; analyze response to same; analyze lit guarantee; analyze/draft email to C. Piehl; analyze notice from Supreme Ct. re: dates for Trestle Creek hearing; email same to clients
04/26/2016	10	\$250.00	1.9	\$475.00	Analyze email and attachments from C. Piehl; email D. Shafer; analyze email from D. Shafer; email D. Shafer; analyze email from B. Haberman
04/27/2016	10	\$250.00	2.9	\$725.00	Analyze emails from B. Haberman; respond to same; analyze motion to strike filed by VP, Inc.; analyze/draft email to client; outline response to VP and JV motions to strike; begin draft/analyze response to the same; analyze and respond to multiple emails from client
04/28/2016	10	\$250.00	0.8	\$200.00	Analyze email from D. Shafer; telephone conference with D. Shafer; analyze email from the court; email to client
04/29/2016	10	\$250.00	0.4	\$100.00	Analyze order from Court denying motions to strike Haberman affidavit and attachment; analyze email from client
05/02/2016	10	\$250.00	4.4	\$1,100.00	Prepare for drafting final judgment by analyzing properties subject to RE Loans, Pensco and MF08 mortgages; identify properties subject only to RE and the Redemption Deed; properties only subject to Pensco and the Redemption Deed; properties only subject to Pensco and MF08 and the Redemption Deed; analyze properties only subject to MF08 and the redemption deed
05/03/2016	10	\$250.00	3.3	\$825.00	Outline properties subject to the RE Loans, Pensco, MF08 mortgages and the Redemption Deed; draft/analyze email to D. Shafer
05/04/2016	10	\$250.00	1.9	\$475.00	Research issues for final judgment
05/05/2016	10	\$250.00	1.1	\$275.00	Analyze draft email to C. Piehl; analyze email from D. Shafer
05/09/2016	10	\$250.00	1.9	\$475.00	Analyze email from D. Shafer; analyze parcel spreadsheet and lot releases/partial lot releases; email D. Shafer
05/10/2016	10	\$250.00	3.7	\$925.00	Analyze email from D. Shafer; analyze/draft email to D. Shafer; analyze emails from D. Shafer and M. Hathaway
05/11/2016	10	\$250.00	0.6	\$150.00	Analyze email from client; telephone conference with client
05/12/2016	6	\$250.00	0.7	\$175.00	Review correspondence from W. Haberman
05/13/2016	6	\$250.00	3.3	\$825.00	Review closing arguments of JV and VP; research issues; correspondence from B. Kramer
05/26/2016	6	\$250.00	1.2	\$300.00	Correspondence to clients
05/26/2016	10	\$250.00	6.2	\$1,550.00	Analyze and finalize rebuttal arguments; analyze emails from clients
05/27/2016	6	\$250.00	2.2	\$550.00	Review Court's Memorandum Decision; telephone conference with clients
05/27/2016	10	\$250.00	2.8	\$700.00	Analyze memorandum decision and order from Bonner County Court; confer with J. Sykes; telephone conference with clients; email D. Penny; analyze response
05/31/2016	6	\$250.00	0.5	\$125.00	Telephone conference with clients
05/31/2016	10	\$250.00	4.4	\$1,100.00	Analyze emails from clients; respond to same; research post-decision motions; draft judgment and order of sale
6/8/2016	10	\$250.00	0.4	\$100.00	Analyze email from client; respond to the same; confer with C. Tipton
6/9/2016	10	\$250.00	9.1	\$2,275.00	Draft/analyze/edit judgment and decree of foreclosure
6/13/2016	10	\$250.00	6.2	\$1,550.00	Finalize proposed judgment and foreclosure decree; outline motion for proposed order of sale; research marshalling doctrines; Analyze disaster clean-up issues; telephone conference with court clerk; analyze/edit/draft changes to judgment and foreclosure decree; forward the same to clients; continue research; draft/analyze/edit motion for proposed order of sale
6/20/2016	10	\$250.00	7.2	\$1,800.00	

8/21/2016	10	\$250.00	6.7	\$1,675.00	Analyze/draft/edit memorandum in support of motion for order of sale
8/22/2016	10	\$250.00	7.8	\$1,950.00	Analyze/edit/finalize memo/motion for proposed order of sale; analyze/draft/finalize proposed order of sale
<b>Subtotal of Fees</b>			<b>794.90</b>	<b>\$192,557.50</b>	
<b>JV's Pro Rata Share</b>		<b>50.0%</b>	<b>397.45</b>	<b>\$96,278.75</b>	

**Subsection B-3**  
**GENESIS v. POBD**  
**Case No. CV 09-1810**  
**Fees Attributed Jointly to NIR and JV**

Trans Date	Atty	Rate	Hours to Bill	Amount	
10/29/2012	15	\$190.00	4.6	\$874.00	Compare legal descriptions among lawsuits
10/29/2012	10	\$250.00	0.9	\$225.00	Litigation strategy meeting with C. Nicholson regarding identification of properties subject to cross-claims in case
10/30/2012	15	\$190.00	1.6	\$304.00	Draft memorandum to R. Stacey regarding property involved in various suits; conference with R. Stacey
03/20/2013	10	\$250.00	2.9	\$725.00	Analyze email from client and respond to same; analyze motion to lift MF08 bankruptcy stay; email J. Krause regarding the same; telephone conference with S. Weeks regarding NIR claims; prepare for and participate in conference call with R. Dishnica and J. Holley; draft letter to S. Weeks regarding priority of RE Loans' mortgage based upon subordination agreement; analyze motion for judgment on the pleadings filed by JV, LLC in the Union Bank case
04/12/2013	10	\$170.00	2.2	\$374.00	Outline answer to NIR and JV LLC cross claims
04/16/2013	10	\$170.00	0.2	\$34.00	Analyze pleadings filed for motion on pleadings
04/19/2013	10	\$170.00	0.8	\$136.00	Analyze pleadings in anticipation of answering cross-claims of NIR and JV, LLC
02/18/2014	10	\$250.00	1.3	\$325.00	Analyze JV, LLC and N. Idaho Resorts docs
05/09/2014	10	\$250.00	0.6	\$150.00	Telephone conference with G. Finney regarding possibility of client purchasing note; leave voicemail for S. Weeks regarding the same
05/12/2014	10	\$250.00	0.3	\$75.00	Analyze email from F. Elsaesser and forward and email client regarding the same; leave voicemail for opposing counsel regarding purchase of note
05/14/2014	10	\$250.00	0.3	\$75.00	Telephone conference with S. Weeks regarding sale of note
<b>Subtotal for Fees</b>			<b>15.70</b>	<b>\$3,297.00</b>	
<b>JV's Pro Rata Share</b>		<b>50.0%</b>	<b>7.85</b>	<b>\$1,648.50</b>	

**Subsection B-4**  
**VALIANT FORECLOSURE**  
**Fees Attributed Jointly to NIR, VP, and JV**

Trans Date	Atty	Rate	Hours to Bill	Amount	
09/02/2014	10	\$270.00	1.4	\$378.00	Analyze pleadings and litigation issues
09/04/2014	10	\$270.00	0.8	\$216.00	Telephone conference with G. Finney regarding 7 day extension to answer complaint; analyze email from client and draft/analyze reply to same; analyze pleadings filed by North Idaho Resorts and HOA related to the motion to substitute Valiant as the real party in interest
09/12/2014	10	\$270.00	2.1	\$567.00	Analyze email from C. Dodson; draft/edit acceptance of service; analyze email from T. McLaughlin regarding issues with maintenance facility; telephone conference with G. Finney regarding status of JV, LLC answer and request extension on behalf of ACI; analyze letter from HOA and email client regarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. Lynskey; analyze amended litigation guarantee; email client
09/17/2014	6	\$160.00	0.6	\$96.00	Study matrix for deadlines; revise same
10/07/2014	10	\$270.00	3.1	\$837.00	Analyze/draft/edit affirmative defenses to JV cross claim; analyze/edit answer to JV, LLC claims; analyze motion filed by VP, LLC; w/c J. Braux re: golf course; w/c and emails with client; confer w/ J. Sykes
10/08/2014	6	\$160.00	0.6	\$96.00	Strategy conference with R. Stacey
11/20/2014	10	\$270.00	2.3	\$621.00	Draft/analyze/edit motion to amend third party complaint; research same; analyze service issues
11/26/2014	6	\$270.00	0.4	\$108.00	Confer with R. Stacey; study scheduling order
12/03/2014	6	\$270.00	4.2	\$1,134.00	Begin study of real property record
12/04/2014	6	\$270.00	3.2	\$864.00	Continue study of real property records
12/08/2014	6	\$270.00	3.4	\$918.00	Study pleadings in prior cases related to summary judgment motions
12/09/2014	6	\$270.00	3.4	\$918.00	Begin preparation of statement of facts for summary judgment motion
12/10/2014	6	\$270.00	5.2	\$1,404.00	Study Reeves affidavit and pleadings; continue preparation of statement of facts
12/11/2014	10	\$270.00	2.6	\$702.00	Analyze project documents; outline summary judgment arguments; draft notice of appearance on behalf of HLT and Independent Mortgage; draft/analyze/edit stipulation to judgment against HOA and

Date	Hours	Rate	Hours	Amount	Description
12/11/2014	6	\$270.00	3.1	\$837.00	Panhandle Management Research legal arguments for summary judgment motion and supporting pleadings
12/12/2014	6	\$270.00	2.2	\$594.00	Begin preparation of summary judgment motion and supporting pleadings; legal arguments
12/15/2014	6	\$270.00	7.4	\$1,998.00	Continue preparation of summary judgment; revise statement of facts and legal argument
12/16/2014	10	\$270.00	2.4	\$648.00	Confer with J. Sykes; analyze project documents; analyze legal description
12/16/2014	6	\$270.00	2.1	\$567.00	Research issues related to summary judgment motion
12/16/2014	6	\$270.00	4.2	\$1,134.00	Study research memorandum and related regulations
12/17/2014	6	\$270.00	6	\$1,620.00	Continue preparation of summary judgment motion and supporting pleadings; telephone conference with J. Hamilton; study real property records
12/22/2014	10	\$270.00	0.6	\$162.00	Research motion for judgment on the pleadings
12/30/2014	6	\$270.00	3.4	\$918.00	Prepare declarations to support summary judgment memorandum
12/30/2014	6	\$270.00	3.2	\$864.00	Prepare interrogatories, requests for production and requests for admission to propound upon JV, North Idaho Resorts and VP
01/05/2015	6	\$270.00	0.9	\$243.00	Telephone conference with clients
01/05/2015	6	\$270.00	3.1	\$837.00	Continue preparation of summary judgment briefing
01/05/2015	6	\$270.00	1.2	\$324.00	Correspondence with client; research foreclosure sale issues
01/06/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes
01/09/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes regarding summary judgment issues
01/09/2015	6	\$270.00	3.9	\$1,053.00	Review and revise memorandum in support of motion for summary judgment
01/12/2015	6	\$270.00	5.2	\$1,404.00	Revise summary judgment memorandum; study Union Bank case
01/12/2015	6	\$270.00	0.3	\$81.00	Telephone conference with D. Shafer
01/13/2015	6	\$270.00	3.3	\$891.00	Continue drafting summary judgment memorandum and supporting pleadings
01/14/2015	6	\$270.00	5	\$1,350.00	Prepare summary judgment supporting declaration of counsel; revise summary judgment memorandum
01/15/2015	6	\$270.00	4.8	\$1,296.00	Revise summary judgment legal arguments; final declaration of counsel
01/16/2015	6	\$270.00	3.5	\$945.00	Telephone conference with client; final summary judgment pleadings
01/16/2015	6	\$250.00	2.9	\$725.00	Prepare documents requested by client
01/20/2015	6	\$250.00	3.2	\$800.00	Prepare discovery requests to propound upon JV, NIR and VP
01/20/2015	6	\$250.00	1.3	\$325.00	Outline argument for summary judgment hearing
01/21/2015	6	\$270.00	0.6	\$162.00	Telephone conference with D. Shafer
01/21/2015	6	\$250.00	2.7	\$675.00	Review and revise discovery requests to JV, NIR and VP
01/22/2015	5	\$250.00	0.5	\$125.00	Correspondence with clients
01/23/2015	6	\$250.00	2.5	\$625.00	Revise discovery requests [interrogatories, requests for production and requests for admission] to propound upon JV, NIR and VP
01/26/2015	6	\$250.00	2.7	\$675.00	Final discovery requests for service upon JV, NIR and VP
02/03/2015	18	\$100.00	3.9	\$380.00	Research requirements related to clubhouse
02/03/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes regarding litigation
02/04/2015	18	\$100.00	4.1	\$410.00	Review case law; outline argument
02/05/2015	10	\$250.00	2.1	\$525.00	Review/analyze Summary Judgment responses
02/05/2015	10	\$250.00	0.3	\$75.00	Email client regarding same
02/05/2015	18	\$100.00	3.9	\$390.00	Draft research memorandum
02/06/2015	10	\$270.00	0.6	\$162.00	Analyze emails from client and confer with J. Sykes regarding same
02/09/2015	6	\$250.00	0.9	\$225.00	Prepare stipulation to reschedule summary judgment hearing
02/12/2015	6	\$250.00	0.2	\$50.00	Correspondence with S. Weeks and G. Finney regarding possible settlement conference
02/13/2015	6	\$250.00	0.9	\$225.00	Correspondence with clients
02/18/2015	6	\$270.00	2.6	\$702.00	Correspondence with client; review plat map; telephone conference with D. Shafer
02/19/2015	6	\$270.00	1.1	\$297.00	Correspondence with D. Shafer regarding expert issues
02/23/2015	10	\$250.00	0.9	\$225.00	Review/analyze emails from client and analyze/draft responses to the same
02/23/2015	10	\$250.00	2.1	\$525.00	Review/analyze memorandums filed in opposition to client's motions for summary judgment
02/24/2015	6	\$250.00	4.2	\$1,050.00	Continue preparation of reply memoranda to summary judgment oppositions by JV, NIR and VP
02/24/2015	6	\$270.00	2.2	\$594.00	Prepare letter to Fidelity
03/03/2015	6	\$250.00	2.3	\$700.00	Prepare correspondence to Fidelity
03/11/2015	6	\$250.00	2.2	\$550.00	Begin preparation for hearing on summary judgment motions
03/12/2015	6	\$250.00	0.3	\$75.00	Correspondence with D. Shafer
03/12/2015	6	\$270.00	0.3	\$81.00	Correspondence with D. Shafer regarding expert issues
03/13/2015	6	\$250.00	1.2	\$300.00	Telephone conference with B. Kramer and W. Haberman
03/16/2015	6	\$250.00	0.7	\$175.00	Continue preparation for hearing on summary judgment motions
03/16/2015	10	\$250.00	0.6	\$150.00	Travel to and from meeting with D. Shafer
03/18/2015	10	\$250.00	1.7	\$425.00	Prepare for and attend meeting with D. Shafer
03/18/2015	10	\$250.00	0.6	\$150.00	Analyze documents from D. Shafer
03/19/2015	6	\$250.00	2	\$500.00	Appear for/attend hearing
03/18/2015	6	\$250.00	0.2	\$50.00	Telephone conference with D. Shafer
03/18/2015	6	\$250.00	0.5	\$125.00	Review/analyze maps
03/18/2015	10	\$270.00	0.6	\$162.00	Travel to and from meeting with D. Shafer
03/18/2015	10	\$270.00	1.7	\$459.00	Prepare for and attend meeting with D. Shafer regarding expert issues
03/18/2015	10	\$270.00	0.6	\$162.00	Analyze documents from D. Shafer
03/18/2015	6	\$270.00	0.2	\$54.00	Telephone conference with D. Shafer
03/18/2015	6	\$270.00	0.5	\$135.00	Review/analyze documentation prepared by D. Shafer
03/17/2015	10	\$250.00	0.2	\$50.00	Telephone conference with B. Anderson regarding status of hearing
03/17/2015	6	\$250.00	3.5	\$875.00	Travel to Spokane, Washington for summary judgment hearing
03/19/2015	6	\$250.00	6.5	\$1,625.00	Travel to Sandpoint, Idaho for summary judgment hearing and return to Spokane, Washington
03/19/2015	6	\$250.00	3.2	\$800.00	Prepare for summary judgment hearing
03/18/2015	6	\$250.00	0.7	\$175.00	Telephone conference with clients following summary judgment

03/18/2015	6	\$250.00	3.5	\$875.00	hearing
03/19/2015	6	\$250.00	0.2	\$50.00	Return to Boise, Idaho from Spokane, Washington
03/23/2015	6	\$250.00	2.1	\$525.00	Review and respond to correspondence from W. Haberman
03/23/2015	6	\$270.00	2.1	\$567.00	Review correspondence from and telephone conference with D. Shafer
03/24/2015	6	\$270.00	1.1	\$297.00	Review correspondence from and telephone conference with D. Shafer
03/24/2015	6	\$270.00	1.8	\$486.00	Correspondence with B. Kramer; telephone conference with S. Nieman
03/24/2015	6	\$250.00	0.9	\$225.00	Correspondence with D. Shafer regarding expert issues; correspondence with clients regarding same
03/24/2015	6	\$250.00	0.6	\$150.00	Review matrix of properties
03/24/2015	6	\$250.00	0.3	\$75.00	Correspondence with clients
03/25/2015	6	\$250.00	0.2	\$50.00	Telephone conference with D. Shafer
03/25/2015	6	\$270.00	0.7	\$189.00	Correspondence with B. Kramer; telephone conference with J. Miller; telephone conference with S. Nieman
03/25/2015	6	\$270.00	0.2	\$54.00	Telephone conference with D. Shafer regarding expert issues
03/26/2015	6	\$270.00	0.9	\$243.00	Telephone conference with D. Shafer; review documentation; correspondence with clients regarding same
03/26/2015	6	\$250.00	1.3	\$325.00	Prepare correspondence to D. Kreifels
03/26/2015	6	\$250.00	0.4	\$100.00	Review email correspondence
03/26/2015	6	\$250.00	0.4	\$100.00	Telephone conference with D. Shafer
03/26/2015	6	\$250.00	0.3	\$75.00	Review maps
03/26/2015	6	\$250.00	0.2	\$50.00	Correspondence with clients
03/30/2015	10	\$250.00	2.1	\$525.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6	\$250.00	0.6	\$150.00	Telephone conference with D. Shafer
03/30/2015	6	\$250.00	0.6	\$150.00	Study drawings
03/30/2015	6	\$250.00	0.4	\$100.00	Telephone conference with clients regarding same
03/30/2015	10	\$270.00	2.1	\$567.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6	\$270.00	1.6	\$432.00	Telephone conference with D. Shafer regarding expert issues; telephone conference with clients regarding same
03/31/2015	6	\$250.00	0.8	\$200.00	Telephone conference with D. Shafer and W. Haberman
03/31/2015	6	\$270.00	0.8	\$216.00	Telephone conference with D. Shafer and W. Haberman
04/03/2015	6	\$270.00	1.2	\$324.00	Review/analyze documentation prepared by D. Shafer
04/03/2015	6	\$270.00	0.6	\$162.00	Telephone conference with D. Shafer
04/06/2015	6	\$270.00	0.4	\$108.00	Telephone conference with S. Neiman
04/06/2015	10	\$270.00	2.7	\$729.00	Analyze documentation prepared by D. Shafer; prepare outline regarding the same; telephone conference with D. Shafer regarding the same
04/08/2015	6	\$270.00	0.3	\$81.00	Prepare letter to S. Neiman
04/10/2015	6	\$270.00	0.9	\$243.00	Telephone conference with D. Shafer regarding expert issues
04/14/2015	6	\$270.00	1.1	\$297.00	Begin preparation of Shafer declaration
04/15/2015	6	\$270.00	0.2	\$54.00	Telephone conference with D. Shafer regarding expert issues
04/15/2015	6	\$250.00	0.5	\$125.00	Correspondence with clients
04/15/2015	6	\$250.00	1.1	\$275.00	Study summary judgment ruling
04/16/2015	6	\$250.00	0.2	\$50.00	Telephone conference with T. McLaughlin
04/16/2015	6	\$250.00	0.3	\$75.00	Correspondence with client
04/16/2015	10	\$270.00	1.8	\$432.00	Analyze Summary Judgment decision; email client regarding the same and analyze responses
04/17/2015	10	\$270.00	1.6	\$432.00	Prepare for and attend conference call with clients
04/17/2015	6	\$270.00	1.1	\$297.00	Telephone conference with B. Kramer and others
04/21/2015	6	\$250.00	0.4	\$100.00	Correspondence with Fidelity
04/24/2015	10	\$270.00	1.6	\$972.00	Confer with J. Sykes regarding litigation
04/24/2015	6	\$270.00	1.3	\$351.00	Confer with R. Stacey regarding litigation
04/27/2015	10	\$270.00	0.9	\$243.00	Telephone conference with B. Haberman regarding summary judgment; confer with J. Sykes regarding same; email client; analyze client response
05/06/2015	10	\$270.00	3.3	\$891.00	Confer with J. Sykes regarding issues related to litigation
05/07/2015	10	\$270.00	0.6	\$162.00	Analyze emails from client; email client regarding the same
05/08/2015	10	\$270.00	3.6	\$972.00	Research legal issues related to summary judgment
05/09/2015	10	\$270.00	0.1	\$27.00	Analyze email from client; email J. Sykes regarding same
05/11/2015	10	\$270.00	4.1	\$1,107.00	Analyze information from D. Shafer; outline Shafer declaration; analyze email from opposing counsel
06/17/2015	15	\$225.00	5.7	\$1,282.50	Travel from Boise to Sandpoint, prepare for hearing, attend hearing, telephone conference with Brian Kramer
06/17/2015	10	\$270.00	0.6	\$162.00	Confer with C. Nicholson regarding outcome of hearing on motion for final judgment
06/18/2015	15	\$225.00	2.1	\$472.50	E-mail hearing update to B. Haberman; travel Spokane to Boise
06/22/2015	15	\$195.00	2.8	\$546.00	Research motion to reconsider
06/22/2015	15	\$195.00	1.9	\$370.50	Research motion to reconsider and opposition to summary judgment
06/23/2015	6	\$250.00	1.7	\$425.00	Analyze client documents and property records
06/23/2015	6	\$250.00	0.2	\$50.00	Correspondence with clients
06/23/2015	15	\$195.00	1.7	\$331.50	Research regarding standard of review for 11(a)(2)(B) motion
06/23/2015	10	\$250.00	1	\$250.00	Analyze memorandum decision and order and confer with J. Sykes regarding the same
06/23/2015	10	\$250.00	0.4	\$100.00	Email client
06/23/2015	15	\$225.00	0.1	\$22.50	Review of Memorandum Decision and Order regarding motion for Entry of Final Judgment
06/23/2015	6	\$270.00	1.2	\$324.00	Review draft of final judgment; correspondence with Fidelity
06/24/2015	15	\$195.00	0.9	\$175.50	Begin drafting memoranda in opposition to JVA/P/NIR motion to reconsider
06/24/2015	15	\$195.00	0.8	\$156.00	Research I.C. 55-806
06/24/2015	15	\$195.00	1.4	\$273.00	Continue drafting memoranda in Opposition to JVA/P/NIR Motions to Reconsider
06/24/2015	15	\$195.00	0.5	\$97.50	Research standard of review
06/24/2015	15	\$195.00	1.3	\$253.50	Research standard of review
06/25/2015	15	\$195.00	3.2	\$624.00	Continue drafting memoranda in opposition to JVA/P/NIR Motions to

					Reconsider
06/25/2015	15	\$195.00	0.8	\$156.00	Review of Chuck Reeves deposition from Union Bank case
06/25/2015	15	\$195.00	1.2	\$234.00	Research submission of admissible evidence
06/26/2015	15	\$195.00	7.2	\$1,404.00	Continue Drafting memoranda in opposition to JV/VP/NIR Motions to reconsider
06/26/2015	6	\$250.00	1.5	\$375.00	Draft affidavits and motion in support of motions to reconsider
06/26/2015	10	\$250.00	0.5	\$125.00	Telephone conference with client
06/29/2015	15	\$195.00	1.6	\$312.00	Finish Drafting memoranda in opposition to JV/VP/NIR Motions to Reconsider
06/29/2015	6	\$250.00	1.9	\$475.00	Revise motions and affidavits in support of oppositions to motions to reconsider
06/29/2015	10	\$250.00	0.6	\$150.00	Confer with J. Sykes and C. Nicholson
06/30/2015	10	\$270.00	0.4	\$108.00	Conference call with D. Shafer
06/30/2015	10	\$270.00	1	\$270.00	Research statute of frauds
07/01/2015	10	\$250.00	2.8	\$700.00	Analyze/draft/revise/finalize affidavits in support of memorandums in opposition to motions to reconsider
07/02/2015	10	\$270.00	0.3	\$81.00	Analyze emails from D. Shafer to R. Lynskey; email D. Shafer regarding the same
07/04/2015	10	\$270.00	0.1	\$27.00	Analyze email from B. Haberman
07/06/2015	10	\$270.00	2.4	\$648.00	Analyze site maps and other documents from D. Shafer; analyze multiple emails from D. Shafer; draft responses to same; (3) telephone conference with D. Shafer; email B. Haberman; analyze multiple emails from B. Haberman and respond to the same
07/06/2015	10	\$250.00	1.1	\$275.00	Review/analyze issues with service of oppositions to motion to reconsider
07/06/2015	10	\$250.00	1.4	\$350.00	Draft/revise motion to vacate hearing date to serve opposition briefing
07/07/2015	10	\$250.00	3.1	\$775.00	Prepare for motion to reconsider
07/07/2015	10	\$250.00	0.3	\$75.00	Telephone conference with court clerk regarding waiver of objection for untimely filing
07/07/2015	10	\$250.00	0.1	\$25.00	Analyze email from clerk regarding waiver of objection for untimely filing
07/07/2015	10	\$250.00	0.3	\$75.00	Email client regarding status
07/07/2015	6	\$270.00	0.6	\$162.00	Confer with R. Stacey
07/08/2015	6	\$270.00	0.9	\$243.00	Research tax deeds; confer with R. Stacey regarding same
07/08/2015	15	\$225.00	0.2	\$45.00	Analysis of redemption deed statutes with J. Sykes
07/08/2015	10	\$270.00	0.6	\$162.00	Analyze emails from D. Shafer and respond to the same; analyze email from D. Staples; telephone conference with W. Haberman re same; analyze emails from W. Haberman
07/08/2015	10	\$250.00	9.7	\$2,425.00	Travel to and from Sandpoint, Idaho
07/08/2015	10	\$250.00	3.4	\$850.00	Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider
07/09/2015	10	\$250.00	2.7	\$675.00	Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same
07/09/2015	10	\$250.00	0.3	\$75.00	Analyze email from client
07/09/2015	10	\$250.00	0.2	\$50.00	Draft/analyze response to client email
07/09/2015	10	\$270.00	3.9	\$1,053.00	Prepare for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer and B. Haberman; analyze documents from D. Shafer; analyze property on Bonner County Assessor's website
07/10/2015	10	\$270.00	2.9	\$783.00	Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer
07/13/2015	10	\$270.00	4.3	\$1,161.00	Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman; draft/analyze email to him regarding the same
07/22/2015	6	\$270.00	1.1	\$297.00	Review scheduling order; attend pretrial conference
07/22/2015	15	\$225.00	1.7	\$382.50	Research regarding water rights; telephone conference regarding same;
07/22/2015	10	\$270.00	5.1	\$1,647.00	Outline changes to judgment and foreclosure decree per court's memorandum decision; analyze emails from C. Reeves and client; confer with C. Nicholson and J. Sykes regarding the same; draft/analyze multiple emails to clients regarding same; confer with local counsel regarding the same; analyze emails from client and C. Reeves; perform legal research re same; analyze documents from D. Shafer and forward same to client
07/22/2015	10	\$250.00	2.9	\$725.00	Analyze decision denying motions to reconsider
07/22/2015	10	\$250.00	1	\$250.00	Email and telephone conferences (3) with client
07/23/2015	10	\$250.00	1.6	\$400.00	Analyze/draft/edit changes to the judgment per court's memorandum decision denying motion to reconsider.
07/23/2015	10	\$270.00	3.3	\$891.00	Analyze/draft/edit changes to the decree of foreclosure per court's memorandum decision; analyze litigation guarantee; request copies of recorded instruments from First American
07/23/2015	6	\$270.00	0.6	\$162.00	Review/analyze judgment and order of sale
07/24/2015	15	\$225.00	1.4	\$315.00	Research water rights
07/24/2015	10	\$270.00	4.1	\$1,107.00	Analyze documents from B. Haberman; email D. Shafer; analyze emails from D. Shafer regarding same; verify accuracy of plats; research legal issues
07/24/2015	6	\$270.00	0.4	\$108.00	Review/analyze decree of foreclosure
07/27/2015	10	\$270.00	0.4	\$108.00	Analyze emails from B. Haberman and respond to the same; analyze email from R. Myers and respond to the same
07/28/2015	6	\$250.00	2.1	\$525.00	Prepare correspondence regarding decisions issued by court on motions for reconsideration
07/28/2015	10	\$250.00	0.2	\$50.00	Analyze emails from R. Meyers and B. Haberman
07/29/2015	10	\$270.00	1.6	\$432.00	Analyze email from R. Myers; analyze email from B. Haberman; analyze emails from B. Haberman to R. Myers; email B. Haberman; prepare for and telephone conference with B. Haberman; email title company; analyze court order vacating hearing on proposed

07/30/2015	10	\$270.00	0.3	\$216.00	order of sale and requesting Order for entry granting the same; telephone conference with (2) court clerk and advise of preference for hearing to proceed
07/31/2015	10	\$250.00	2.4	\$600.00	Email R. Myers regarding teleconference to discuss status of case; email B. Haberman regarding the same; analyze
08/03/2015	10	\$270.00	1.6	\$432.00	email from B. Haberman; leave voicemail for court clerk re: order vacating hearing on proposed order of sale; telephone conference with court clerk regarding the same
08/05/2015	10	\$270.00	11.8	\$3,132.00	Analyze documents from Bonner County Assessor
08/08/2015	18	\$100.00	6.1	\$610.00	Prepare for hearing; travel to Sandpoint, ID and back to Boise, ID; attend and argue in favor of motion at hearing; coordinate with court for execution of judgment; deliver and record judgment at Bonner County Recorder's Office; telephone conference with B. Kramer regarding outcome of hearing; B. Haberman regarding outcome of hearing
08/06/2015	15	\$225.00	3.1	\$697.50	Research foreclosure sales
08/06/2015	10	\$250.00	0.2	\$50.00	Research regarding foreclosure sales
08/07/2015	18	\$100.00	5.5	\$550.00	Analyze email from Fidelity
08/02/2015	10	\$270.00	8.3	\$2,241.00	Research credit bidding
09/02/2015	6	\$250.00	2.7	\$675.00	Travel from Boise, ID to Sandpoint, Idaho for the motion to alter/reconsider order of sale; prepare for hearing on Yaliant's motion to alter or reconsider foreclosure decree and order of sale; confer with J. Sykes regarding the same; telephone conference with clients;
09/02/2015	6	\$250.00	3.2	\$800.00	Prepare for hearing on third motion for reconsideration
09/02/2015	6	\$250.00	1.7	\$425.00	Travel from Boise to Sandpoint, Idaho for hearings
09/02/2015	6	\$250.00	1.6	\$400.00	Attend hearings
09/03/2015	6	\$250.00	3.2	\$800.00	Telephone conference with clients regarding outcome of hearings
09/03/2015	10	\$250.00	0.2	\$50.00	Return to Boise from Sandpoint, Idaho
09/03/2015	10	\$250.00	1	\$250.00	Analyze emails and attachments from B. Haberman
09/03/2015	10	\$250.00	3	\$750.00	Telephone conference with B. Haberman
09/03/2015	15	\$225.00	0.2	\$45.00	Travel from Sandpoint, ID to Boise, ID
09/04/2015	10	\$250.00	1.9	\$475.00	Respond to clients' request for documents
09/08/2015	10	\$250.00	0.3	\$75.00	Analyze court ruling granting motion to reconsider
09/08/2015	10	\$250.00	0.5	\$125.00	Telephone conference with B. Haberman
09/10/2015	10	\$250.00	3.6	\$1,650.00	Analyze order setting trial and pretrial order
09/14/2015	15	\$195.00	1.8	\$351.00	Analyze Pensco and MF08 loan documents, real property records and other documents of record in this case in preparation for motion to reconsider and in support of motion for summary judgment and confer with C. Nicholson regarding the same
09/14/2015	10	\$250.00	1.4	\$350.00	Begin drafting Memo Supp. Motion to Reconsider the Court's 9-4-15 decision; confer with J. Sykes and R. Stacey
09/14/2015	10	\$250.00	2.4	\$600.00	Outline arguments for motion to reconsider
09/14/2015	10	\$250.00	1.5	\$375.00	Outline arguments for motion for summary judgment
09/14/2015	6	\$250.00	1.9	\$475.00	Meet to discuss motion to reconsider, summary judgment and objection to proposed judgment
09/15/2015	15	\$195.00	0.2	\$39.00	Outline issues for third summary judgment motion
09/15/2015	15	\$195.00	0.3	\$156.00	Discuss research project with C. Tipton
09/15/2015	15	\$195.00	0.8	\$156.00	Review and analysis of MF08 All-Inclusive Mortgage & Loan Agreement to prepare B. Ng Decl.
09/15/2015	18	\$100.00	2.3	\$230.00	Begin preparing Ng Decl.
09/16/2015	18	\$100.00	3.8	\$380.00	Discussion with C. Nicholson; Research regarding inconsistent declarations
09/16/2015	15	\$195.00	3.5	\$682.50	Discussion with C. Nicholson; Research regarding inconsistent declarations
09/17/2015	15	\$195.00	0.2	\$39.00	Draft Barney Ng decl.
09/17/2015	15	\$195.00	0.3	\$58.50	Correspondence with W. Haberman
09/17/2015	15	\$195.00	1.3	\$253.50	Review and analyze POBD mortgages with R.E. Loans, MF08 & Pensco
09/17/2015	15	\$195.00	0.9	\$175.50	Review and analyze loan agreements between POBD and RE Loans/MF08
09/17/2015	15	\$195.00	0.6	\$117.00	Review and analysis of notes between POBD & RE Loans, Pensco & MF08
09/17/2015	15	\$195.00	2.1	\$409.50	Review and analysis of Pensco related documents received from B. Ng
09/17/2015	6	\$250.00	0.3	\$75.00	Review, analyze and compare Borrowers Funding Authorization & Analyze with Settlement Statement relied upon by VP/NIR/JV and other closing documents (check stub to POBD, CA disclosure form, etc.)
09/17/2015	6	\$250.00	3.2	\$800.00	Review scheduling order regarding expert disclosures
09/17/2015	6	\$250.00	0.9	\$225.00	Study second summary judgment motion and supporting pleadings
09/17/2015	6	\$250.00	0.3	\$75.00	Telephone conference with F. Elsaesser
09/17/2015	6	\$250.00	0.3	\$75.00	Telephone conference with W. Haberman
09/17/2015	18	\$100.00	4.5	\$450.00	Research/Draft Argument regarding inconsistent Decl.
09/17/2015	6	\$270.00	1.2	\$324.00	Telephone conference with F. Elsaesser regarding summary judgment motion; telephone conference with W. Haberman
09/18/2015	15	\$195.00	0.1	\$19.50	Review Notice regarding proposed Judgment between VP, NIR & JV, order vacating 8/5/15 Judgment, and order vacating 8/5/15 decree of foreclosure
09/18/2015	18	\$100.00	1.2	\$120.00	Research regarding Inconsistent Decl.
09/18/2015	15	\$195.00	0.8	\$156.00	Telephone conference with J. Sykes, W. Haberman and E. Ford
09/18/2015	15	\$195.00	2.4	\$468.00	Continue drafting Ng declaration
09/18/2015	6	\$250.00	1.4	\$350.00	Revise declaration of B. Ng
09/18/2015	6	\$250.00	0.3	\$75.00	Telephone conference with F. Elsaesser
09/19/2015	15	\$195.00	0.2	\$39.00	Correspondence with Janet Robnett regarding representation of POBD in conjunction with closing of RE Loans, Pensco and MF08 loans
09/20/2015	15	\$195.00	1.3	\$253.50	Complete initial draft of Ng Decl.
09/21/2015	15	\$195.00	0.9	\$175.50	Prepare for and telephone conference with J. Sykes, W. Haberman and B. Ng

09/21/2015	15	\$195.00	0.3	\$58.50	Review correspondence from W. Haberman
09/21/2015	15	\$195.00	1.8	\$351.00	Revise Ng Decl.
09/21/2015	15	\$195.00	0.2	\$39.00	Draft Third Motion for Summary Judgment
09/21/2015	15	\$195.00	2	\$390.00	Begin Drafting Memo. Supp. 3rd Mot. for Summary Judgment
09/21/2015	6	\$250.00	1.2	\$300.00	Telephone conference with B. Ng
09/21/2015	18	\$100.00	6.2	\$620.00	Research/Draft Argument regarding inconsistent Decl.
09/22/2015	18	\$100.00	3.2	\$320.00	Research regarding inconsistent Decl.
09/22/2015	6	\$270.00	0.9	\$243.00	Correspondence with S. Rasor
09/22/2015	6	\$270.00	1.1	\$297.00	Prepare documents for Rasor review
09/22/2015	15	\$195.00	0.3	\$156.00	Finish revisions to second draft of Ng Declaration
09/22/2015	15	\$195.00	5.1	\$994.50	Continue draft Memo Supp 3rd MSJ
09/22/2015	6	\$250.00	0.7	\$175.00	Review and revise declaration of B. Ng
09/22/2015	6	\$250.00	1.4	\$350.00	Correspondence with G. Finney regarding depositions of C. Reeves and First American
09/22/2015	6	\$250.00	0.3	\$200.00	Correspondence with W. Haberman
09/22/2015	6	\$250.00	0.3	\$75.00	Correspondence regarding Reeves deposition
09/23/2015	15	\$195.00	3.3	\$1,618.50	Continue draft Summary Judgment
09/23/2015	15	\$195.00	0.6	\$117.00	Strategy discussion with J. Sykes and C. Tipton
09/23/2015	18	\$100.00	10.2	\$1,020.00	Draft Memo/Argument regarding Shafer Decl.
09/24/2015	15	\$195.00	6.1	\$1,189.50	Finish drafting Memo Supp. 3rd Summary Judgment
09/24/2015	6	\$250.00	3.9	\$975.00	Review and revise summary judgment memorandum and supporting pleadings
09/25/2015	6	\$250.00	0.2	\$50.00	Correspondence with S. Rasor
09/29/2015	10	\$250.00	2.7	\$675.00	Outline discovery to NIR and JV, LLC
09/29/2015	10	\$250.00	0.7	\$175.00	Analyze scheduling order
09/29/2015	10	\$250.00	1.3	\$325.00	Outline deposition notices to C. Reeves and R. Vilelli
09/29/2015	6	\$250.00	1.2	\$300.00	Outline issues regarding depositions, discovery and summary judgment motion
10/01/2015	10	\$250.00	3.6	\$900.00	Outline requests for admission and interrogatories to NIR, VP and JV
10/01/2015	10	\$250.00	0.6	\$150.00	Telephone conference with client
10/01/2015	10	\$250.00	1.1	\$275.00	Review/analyze project documents
10/08/2015	10	\$250.00	0.7	\$175.00	Analyze legal descriptions
10/08/2015	10	\$250.00	0.8	\$200.00	Review/analyze emails from D. Shafer
10/08/2015	10	\$250.00	0.5	\$125.00	Telephone conference with D. Shafer
10/11/2015	10	\$250.00	0.2	\$50.00	Review/analyze email from client
10/12/2015	10	\$250.00	0.6	\$150.00	Email clients
10/12/2015	10	\$250.00	3.3	\$75.00	Analyze emails from client regarding the same
10/13/2015	10	\$250.00	0.3	\$75.00	Email C. Reeves regarding availability for deposition
10/14/2015	15	\$195.00	0.7	\$136.50	Review and analysis of Ng Bankruptcy decl.
10/14/2015	6	\$250.00	1.1	\$275.00	Review/analyze pleadings filed by NIR, JV and VP
10/14/2015	5	\$250.00	1.1	\$275.00	Correspondence with client
10/14/2015	10	\$250.00	1.3	\$325.00	Analyze rules of civil procedure and other legal issues
10/14/2015	10	\$250.00	0.9	\$225.00	Telephone conference with B. Haberman
10/14/2015	10	\$250.00	0.4	\$100.00	Analyze emails from B. Haberman
10/14/2015	10	\$250.00	0.4	\$100.00	Analyze pleadings filed by B. Ng
10/14/2015	10	\$250.00	0.3	\$75.00	Draft notice for client to attend hearing telephonically
10/15/2015	6	\$250.00	1.9	\$475.00	Review/analyze correspondence from clients
10/15/2015	10	\$250.00	0.7	\$175.00	Telephone conference with B. Haberman and B. Kramer
10/15/2015	10	\$250.00	1.8	\$450.00	Outline response
10/15/2015	10	\$250.00	0.6	\$150.00	Analyze emails from B. Haberman and B. Kramer
10/15/2015	10	\$250.00	0.6	\$150.00	Analyze/edit additional points
10/15/2015	10	\$250.00	0.2	\$50.00	Telephone conference with B. Haberman
10/15/2015	10	\$250.00	0.2	\$50.00	Analyze email from client
10/15/2015	10	\$250.00	0.3	\$75.00	Telephone conference with M. Hathaway
10/15/2015	10	\$250.00	2.3	\$575.00	Compile documents and email the same to M. Hathaway
10/16/2015	15	\$195.00	1.6	\$312.00	Draft/revise Decl/Aff Opp Third SJ Motion or alternative Request for Extension of Time to reply and revise supporting Nicholson decl
10/16/2015	10	\$250.00	0.6	\$150.00	Analyze emails from B. Haberman and B. Kramer
10/16/2015	10	\$250.00	1.1	\$275.00	Compile documents and email engineer
10/16/2015	10	\$250.00	0.6	\$150.00	Telephone conference with B. Haberman and B. Kramer
10/16/2015	6	\$270.00	1.9	\$513.00	Study FACTO title policies; draft correspondence to FATCO
10/18/2015	15	\$195.00	3.1	\$604.50	Research regarding breach of note/loan agreement
10/19/2015	15	\$195.00	1.8	\$351.00	Research breach of note/loan agreement
10/19/2015	10	\$250.00	1.7	\$425.00	Draft/analyze/edit affidavit of B. Ng
10/19/2015	10	\$250.00	1.1	\$275.00	Analyze documents related the foregoing reply pleadings
10/20/2015	15	\$195.00	1.1	\$214.50	Analysis of exhibits submitted by JV and NIR/VP in opp to 3rd SJ Motion
10/20/2015	15	\$195.00	0.2	\$39.00	Draft Nicholson Decl. Dated 10/20/15
10/20/2015	6	\$250.00	0.3	\$75.00	Review/analyze second Ng declaration
10/20/2015	6	\$250.00	0.3	\$200.00	Prepare status update
10/20/2015	6	\$250.00	4.1	\$1,025.00	Begin preparation for hearings on motions for reconsideration and second summary judgment motion
10/20/2015	10	\$250.00	0.4	\$100.00	Analyze emails from client
10/20/2015	10	\$250.00	0.3	\$75.00	Analyze/draft email to client
10/20/2015	10	\$250.00	0.2	\$50.00	Analyze client responses
10/20/2015	10	\$250.00	0.7	\$175.00	Draft/analyze/edit changes to B. Ng. Decl.
10/20/2015	10	\$250.00	0.2	\$50.00	Email B. Ng
10/20/2015	10	\$250.00	0.2	\$50.00	Telephone conference with B. Ng
10/20/2015	10	\$250.00	0.3	\$75.00	Draft/analyze changes
10/20/2015	10	\$250.00	0.1	\$25.00	Email the modified agreement to B. Ng
10/21/2015	15	\$195.00	0.7	\$136.50	Research regarding residual exception to hearsay rule
10/21/2015	15	\$195.00	0.9	\$175.50	Research regarding admissibility and use of impeachment evidence
10/21/2015	15	\$195.00	0.5	\$97.50	Research regarding business record exception to hearsay rule
10/22/2015	6	\$250.00	2.2	\$550.00	Continue preparation for hearings on motions for reconsideration and second summary judgment motion
10/22/2015	6	\$250.00	3	\$750.00	Travel to Sandpoint, Idaho
10/22/2015	10	\$250.00	5.1	\$1,275.00	Analyze briefing and prepare for hearing on motion for summary



10/22/2015	10	\$250.00	2.9	\$725.00	judgment
10/23/2015	6	\$250.00	5	\$1,250.00	Travel to Spokane, Washington
10/23/2015	6	\$250.00	1	\$250.00	Appear for/attend hearings on motions for reconsideration and second summary judgment motion
10/23/2015	6	\$250.00	3	\$750.00	Telephone conference with clients regarding outcome of hearings
10/23/2015	10	\$250.00	7.5	\$1,875.00	Return travel to Boise, Idaho
10/23/2015	10	\$250.00	3	\$750.00	Prepare for hearing and attend hearing and argue motion for summary judgment
10/24/2015	10	\$250.00	3.8	\$950.00	Travel to and from Sockane, WA to Sandpoint, ID
10/26/2015	15	\$195.00	0.9	\$175.50	Travel from Spokane, WA to Boise, ID
10/26/2015	6	\$250.00	2.9	\$725.00	Review mortgages
10/26/2015	6	\$250.00	0.4	\$100.00	Correspondence with D. Kreifels
10/26/2015	6	\$250.00	0.9	\$225.00	Review/analyze additional discovery to defendants
10/26/2015	10	\$250.00	1.1	\$275.00	Research issues regarding tax parcel sales
10/26/2015	10	\$250.00	3.1	\$775.00	Analyze previously propounded rogs and rfps
10/26/2015	10	\$250.00	0.8	\$200.00	Draft/analyze/edit rfps and rogs to defendants VP, NIR and JV
10/26/2015	10	\$250.00	0.4	\$100.00	Draft/analyze/edit expert witness disclosures
10/26/2015	10	\$250.00	0.4	\$100.00	Coordinate resumes and other information from experts for expert disclosures
10/26/2015	10	\$270.00	3.6	\$972.00	Draft/analyze/edit lay witness disclosures
10/27/2015	10	\$270.00	1.1	\$297.00	Analyze email from M. Hathaway; telephone conference with M. Hathaway regarding expert witness duties; conference call with M. Hathaway and D. Shafer regarding the same; analyze Shafer exhibits in preparation for conference call; analyze multiple emails back and forth between M. Hathaway and D. Shafer
10/27/2015	15	\$195.00	4.4	\$858.00	Analyze email from counsel for First American; draft/analyze/edit response to the same
10/27/2015	10	\$250.00	0.3	\$75.00	Analysis of documents produced by First American Title Co.
10/27/2015	10	\$250.00	0.3	\$75.00	Draft/analyze notices of service for discovery to JV, NIR and VP
10/27/2015	10	\$250.00	2.7	\$675.00	Draft/analyze email to counsel for First American re: deposition dates
10/28/2015	6	\$250.00	1.2	\$300.00	Analyze documents from Sandpoint Title
10/28/2015	10	\$250.00	0.3	\$75.00	Revise correspondence to D. Kreifels
10/28/2015	10	\$250.00	0.2	\$50.00	Email First American regarding documents produced to JV and NIR
10/28/2015	10	\$250.00	0.9	\$225.00	Analyze response to the same
10/28/2015	10	\$250.00	0.3	\$75.00	Analyze/draft/edit emails to counsel for First American
10/28/2015	10	\$250.00	1.4	\$350.00	Analyze responses to the same
10/28/2015	10	\$250.00	0.6	\$150.00	Compile documentation requested by First American and email the same to counsel for the same
10/28/2015	10	\$250.00	0.3	\$75.00	Compile documentation for D. Shafer
10/29/2015	10	\$250.00	1.6	\$400.00	Analyze email from court clerk
10/29/2015	10	\$250.00	0.9	\$225.00	Analyze emails from client and respond to the same
10/29/2015	10	\$250.00	0.3	\$75.00	Analyze emails (6) from M. Hathaway and D. Shafer
10/29/2015	10	\$250.00	0.6	\$150.00	Prepare for conference call with M. Hathaway and D. Shafer
10/29/2015	10	\$250.00	0.3	\$75.00	Participate in conference call
10/29/2015	10	\$250.00	0.3	\$75.00	Analyze email from G. Edson
10/29/2015	15	\$195.00	0.5	\$97.50	Email G. Edson
10/30/2015	6	\$250.00	0.8	\$200.00	Review of Disclosure Statement for Joint Chapter 11 Plan of Recognition filed in R.E. Loans Texas bankruptcy
10/30/2015	10	\$250.00	0.8	\$200.00	Review and respond to correspondence from D. Kreifels
11/02/2015	15	\$195.00	2.1	\$409.50	Analyze emails and voicemail from G. Edson and leave voicemail in response to the same
11/02/2015	6	\$250.00	1.6	\$400.00	Review/analyze R.E. Loans Bankruptcy filings
11/02/2015	10	\$250.00	0.6	\$150.00	Correspondence to D. Kreifels
11/02/2015	10	\$250.00	0.4	\$100.00	Telephone conference with G. Edson
11/03/2015	15	\$195.00	0.3	\$58.50	Telephone conference and email with client
11/03/2015	10	\$250.00	0.6	\$150.00	Continue Review of RE Loans bankruptcy
11/03/2015	10	\$250.00	0.3	\$75.00	Analyze letter from G. Edson
11/03/2015	10	\$270.00	1.2	\$324.00	Telephone conference and email with client
11/04/2015	10	\$270.00	1.5	\$405.00	Analyze emails from M. Hathaway; respond to same conference call with M. Hathaway and D. Shafer regarding same
11/05/2015	10	\$250.00	0.9	\$225.00	Telephone conference with B. Haberman;
11/05/2015	10	\$250.00	0.5	\$125.00	telephone conference with Bonner County regarding tax parcel issues; draft/analyze email to B. Haberman
11/05/2015	10	\$250.00	0.4	\$100.00	Analyze availability and strategy for taking depositions and leave voicemail for D. Marfice regarding deposition dates
11/05/2015	10	\$250.00	1.2	\$300.00	telephone conference with paralegal for Susan Weeks and G. Finney regarding deposition
11/05/2015	10	\$250.00	0.3	\$75.00	telephone conference with P. DeAngeli regarding scope of Lynskey testimony
11/05/2015	10	\$250.00	1.2	\$300.00	Telephone conference with P. DeAngeli
11/10/2015	6	\$250.00	0.3	\$75.00	Analyze Sandpoint Title documents and email from M. Hathaway and telephone conference with Mr. Hathaway
11/10/2015	10	\$250.00	3.7	\$925.00	Revise correspondence with Fidelity
11/11/2015	15	\$195.00	1	\$195.00	Analyze FATCC documents and draft deposition outlines for the same
11/11/2015	6	\$250.00	1.2	\$300.00	Analysis of Court's Decision regarding 3rd MSJ and other motions heard on October 23, 2015
12/02/2015	6	\$250.00	0.9	\$225.00	Study memorandum decision and order on summary judgment motion
6/23/2016	10	\$250.00	5.6	\$1,400.00	Review/analyze order on summary judgment motion
6/24/2016	10	\$250.00	6.1	\$1,525.00	Research fees/costs
6/27/2016	10	\$250.00	6.3	\$1,575.00	Continue researching fees/costs; outline motion for fees and costs; analyze fee/cost invoices; telephone conference with B. Haberman; confer with J. Sykes; compile invoices
6/28/2016	10	\$250.00	6.7	\$1,675.00	Analyze/draft/edit motion for fees/costs
6/29/2016	10	\$250.00	7.3	\$1,825.00	Continue to analyze/draft/edit motion for fees/costs
6/30/2016	10	\$250.00	7.8	\$1,950.00	Continue to analyze/draft/edit motion for fees/costs

7/1/2016	10	\$250.00	0.5	\$125.00	Analyze email from client; draft changes to proposal, emails and telephone conference with client
7/1/2016	17	\$90.00	5.5	\$90.00	Compile spreadsheets and organize invoices in support of memorandum of costs and fees
7/2/2016	17	\$90.00	11	\$90.00	Segregate spreadsheets and organize invoices in support of memorandum of costs and fees
7/3/2016	17	\$90.00	8.75	\$90.00	Segregate spreadsheets and organize invoices in support of memorandum of costs and fees; incorporate data within memorandum
7/4/2016	17	\$90.00	11.75	\$90.00	Finalize spreadsheets and identification of invoices in support of memorandum of costs and fees
7/5/2016	10	\$250.00	7.1	\$1,775.00	Analyze/draft/finalize motion for fees/costs
7/5/2016	17	\$90.00	8	\$720.00	Finalize work in connection with exhibits to to memorandum of costs
<b>Subtotal of Fees</b>			<b>749.80</b>	<b>\$168,666.00</b>	
<b>JV's Pro Rata Share</b>	<b>33.3%</b>		<b>249.93</b>	<b>\$56,222.00</b>	
<b>JV's GRAND TOTAL:</b>			<b>937.73</b>	<b>\$223,012.75</b>	

EXHIBIT C

**Subsection C-1**  
**GENESIS v. POBD and VALIANT**  
**FORECLOSURE**  
 Fees Attributed to NIR

Trans Date	Atty	Rate	Hours to Bill	Amount	
10/26/2012	15	\$190.00	1.9	\$304.00	Review of litigation guarantee, Pacific Capital's First Amended Complaint, N. Idaho Resorts, LLC's Counterclaim & Crossclaim, ITD's Complaint, and Idaho Club HOA's Complaint
11/19/2012	15	\$190.00		\$0.00	No charge: Review of file regarding NIR claim
03/20/2013	10	\$250.00	1	\$250.00	Analyze North Idaho Resorts cross-claim and property records
03/20/2013	10	\$250.00	0.9	\$225.00	Analyze properties subject to cross-claim
03/21/2013	10	\$250.00	1.3	\$325.00	Analyze email and attachment from J. Krause; reply to same; finalize letter to S. Weeks regarding NIR claims; analyze NIR complaint and email J. Holley regarding title policy
04/15/2013	10	\$170.00	1.2	\$204.00	Analyze/draft answer to NIR cross claim
04/16/2013	10	\$170.00	1.1	\$187.00	Analyze/draft answer to NIR complaint
04/16/2013	10	\$170.00	1.1	\$187.00	Analyze/outline cross claim against NIR
04/17/2013	10	\$170.00	1.2	\$204.00	Analyze/outline affirmative defenses to NIR complaint
04/19/2013	10	\$170.00	1	\$170.00	Analyze/edit answer to NIR cross claim
04/22/2013	10	\$170.00	0.9	\$153.00	Analyze/draft/edit affirmative defenses to NIR cross-claim
04/22/2013	10	\$170.00	3.3	\$561.00	Analyze property records and analyze/draft/edit cross-claim against NIR
04/25/2013	10	\$170.00	2.8	\$476.00	Analyze/draft/edit Answer and Cross Claim to NIR
04/26/2013	10	\$170.00	0.6	\$102.00	Finalize cross-claims against NIR
08/16/2013	15	\$190.00	0.1	\$19.00	E-mail to S. Weeks
08/19/2013	15	\$190.00	0.1	\$19.00	Telephone call to S. Weeks
08/20/2013	15	\$190.00	0.4	\$76.00	Revise NIR stipulation and mail to S. Weeks
08/20/2013	15	\$190.00	0.1	\$19.00	Telephone conference with S. Weeks regarding stipulation
08/20/2013	15	\$190.00	0.1	\$19.00	Analyze pleadings filed by North Idaho Resorts; analyze email from Wells Fargo and reply to same; analyze email from W. Haberman; email counsel for Wells Fargo
08/07/2014	10	\$270.00	0.8	\$216.00	
09/11/2014	10	\$270.00	1.7	\$459.00	Analyze decision granting motion to substitute Valiant as the real party in interest; analyze email from W. Haberman; telephone conferences (2) with S. Weeks regarding acceptance of service; draft/edit acceptance of service; email client regarding extension to answer and status of service; email client responding to earlier email and requesting extension for NIR to answer.
10/01/2015	10	\$250.00	2.8	\$700.00	Draft/revise requests for admission and interrogatories to NIR
10/05/2015	10	\$250.00	3.1	\$775.00	Analyze/draft/edit requests for admission and interrogatories to NIR
10/05/2015	10	\$250.00	1.1	\$275.00	Review/analyze project documents and pleadings for discovery issues related to the same
10/06/2015	10	\$250.00	0.7	\$175.00	Finalize interrogatories to NIR
<b>Subtotal of Fees</b>			<b>28.90</b>	<b>\$6,081.00</b>	

**Subsection C-2**  
**VALIANT FORECLOSURE**  
 Fees Attributed Jointly to NIR and VP

Trans Date	Atty	Rate	Hours to Bill	Amount	
02/09/2015	6	\$250.00	0.2	\$50.00	Telephone conference with S. Weeks regarding summary judgment hearing
02/11/2015	6	\$250.00	0.2	\$50.00	Telephone conference with S. Weeks
02/23/2015	6	\$250.00	4	\$1,000.00	Prepare reply memorandum to NIR/VP summary judgment opposition
03/05/2015	6	\$250.00	6.2	\$1,550.00	Continue preparation of reply memorandum to North Idaho Resorts and VP's opposition
03/06/2015	6	\$250.00	6.8	\$1,700.00	Continue preparation of summary judgment reply memoranda
03/06/2015	18	\$100.00	1.5	\$150.00	Research Equitable Servitude Requirements and Inquiry Notice
03/07/2015	18	\$100.00	2.2	\$220.00	Research Equitable Servitude Requirements and Inquiry Notice
03/09/2015	6	\$250.00	3.2	\$800.00	Revise summary judgment reply memoranda
03/09/2015	6	\$250.00	0.3	\$75.00	Correspondence with D. Shafer regarding legal description
03/09/2015	6	\$270.00	0.3	\$81.00	Correspondence with D. Shafer regarding expert issues
03/09/2015	6	\$250.00	5.7	\$1,425.00	Revisions to summary judgment reply memoranda
03/10/2015	18	\$100.00	6.1	\$610.00	Draft/Revise/Send Memo on Equitable Servitudes
03/10/2015	18	\$100.00	3.7	\$999.00	Analyze defendant's VP's and NIR's second motion for enlargement of time to file memorandum in support of motion for reconsideration; email client; prepare for and participate in conference call with clients and J. Sykes; confer with J. Sykes and C. Tipton regarding legal research
05/27/2015	6	\$270.00	1.2	\$324.00	Telephonic meeting with clients; correspondence with Fidelity
06/16/2015	15	\$195.00	1.4	\$273.00	Review and analysis of JV, LLC's motion to reconsider and court's summary judgment decision
06/17/2015	10	\$250.00	1.3	\$325.00	Analyze motion to reconsider filed by VP and NIR
06/17/2015	10	\$250.00	2.9	\$725.00	Outline strategy and response to VP and NIR motion to reconsider
07/06/2015	10	\$250.00	0.9	\$225.00	Review/analyze motion to reconsider
07/06/2015	10	\$250.00	0.5	\$125.00	Analyze motion for enlargement of time filed by NIR and VP
07/06/2015	10	\$250.00	0.2	\$50.00	Review/analyze email from opposing counsel regarding the same
07/07/2015	10	\$250.00	1.8	\$450.00	Analyze NIR objection

07/07/2015	15	\$225.00	0.6	\$135.00	Review and analysis of NIR/VP's reply in support of its motion for reconsideration and its objection to proposed final judgment (0.4);
07/07/2015	10	\$270.00	2.3	\$621.00	Review and analysis of JV's objection to proposed final judgment (0.2)
08/04/2015	10	\$270.00	3.4	\$918.00	Analyze emails from D. Shafer; draft/analyze responses to the same; telephone conference with D. Shafer;
08/07/2015	15	\$225.00	1.1	\$247.50	email client re: the same; email D. Shafer and B. Haberman regarding conference call;
08/10/2015	18	\$100.00	2.8	\$280.00	email R. Lynksey; analyze response;
08/10/2015	10	\$270.00	3.1	\$837.00	email D. Stapeis
08/10/2015	15	\$225.00	1.1	\$247.50	Analyze motion for proposed order of sale; analyze Valiant memoranda and oppositions filed by NIR; research legal issues;
08/10/2015	18	\$100.00	2.8	\$280.00	outline oral arguments and prepare for hearing on the same
08/10/2015	10	\$270.00	3.1	\$837.00	Continue research regarding foreclosure sales
08/10/2015	15	\$225.00	1.1	\$247.50	Research credit bidding; confer regarding same
08/11/2015	18	\$100.00	2.9	\$290.00	Telephone conference with B. Haberman;
08/11/2015	10	\$270.00	2.7	\$729.00	prepare for and participate in conference call with R. Myers and H. Brooks; confer with C. Nicholson and C. Tipton regarding status of legal research
08/11/2015	15	\$225.00	1.8	\$405.00	Research regarding subrogation and redemption
08/11/2015	6	\$270.00	1.2	\$324.00	Review redemption research; confer with J. Sykes; research inverse alienation
08/12/2015	18	\$100.00	4.8	\$480.00	Research legal issues regarding priority; confer with J. Sykes regarding the same
08/12/2015	15	\$225.00	2.9	\$652.50	Research redemption and credit bidding
08/13/2015	18	\$100.00	6.2	\$620.00	Research foreclosure issue
08/13/2015	10	\$270.00	6.2	\$1,674.00	Research regarding order of sale, marshaling, and inverse alienation
08/13/2015	15	\$225.00	5.7	\$1,282.50	Continued research regarding marshaling of assets
08/13/2015	6	\$270.00	1.6	\$432.00	Research waiver and inverse alienation
08/16/2015	15	\$225.00	12.3	\$2,767.50	Confer with R. Stacey; conference call with R. Stacey and D. Shafer regarding properties
08/17/2015	18	\$100.00	9.5	\$950.00	Additional research & draft memo support motion reconsider order of sale
08/17/2015	10	\$270.00	7.7	\$2,079.00	Research and Draft Motions and Argument for Inverse Alienation
08/17/2015	15	\$225.00	4.3	\$967.50	Draft/analyze/edit motion and memorandum in support of motion to alter foreclosure decree; draft/analyze edit affidavits of C. Reeves and D. Shafer in support of motion to alter foreclosure decree and to reconsider the proposed order of sale; analyze multiple emails from D. Shafer and C. Reeves regarding the same; research legal issues in support of motion to reconsider order of sale and decree of foreclosure
08/17/2015	6	\$270.00	1.1	\$297.00	Revise memo supp reconsider order of sale; additional research regarding marshaling of assets
08/18/2015	18	\$100.00	2.5	\$250.00	Confer with R. Stacey regarding foreclosure procedure; study correspondence from D. Shafer
08/18/2015	10	\$270.00	8.1	\$2,187.00	Research marshaling of assets
08/18/2015	15	\$225.00	9.4	\$2,115.00	Analyze/edit draft memorandum in support of proposed order of sale; email C. Reeves and D. Shafer draft affidavits; analyze emails from C. Reeves and D. Shafer regarding the same; analyze/edit affidavits to reflect requested changes to the same; email C. Reeves and D. Shafer amended affidavits; telephone conference with Pioneer Title regarding Shafer affidavit; telephone conference with D. Shafer (2) regarding the same; analyze/edit affidavit of D. Shafer based upon the same; analyze motions and briefing in support of the same
08/19/2015	10	\$270.00	8.6	\$2,322.00	Continue draft Memo, Supp Motion Alter, Amend, Reconsider
08/28/2015	15	\$225.00	0.3	\$87.50	Analyze/draft/edit motion for proposed order for sale and to alter judgment; multiple telephone conferences with D. Shafer; edit memoranda; draft/analyze/edit declaration of D. Shafer; telephone conference with B. Haberman; analyze exhibits to declarations; analyze legals discussed by D. Shafer; analyze D. Shafer declarations, exhibits and other documents
09/01/2015	10	\$270.00	4.6	\$1,296.00	Review and Analysis of NIR/VP's response to motion to reconsider order of sale
09/04/2015	6	\$250.00	0.4	\$100.00	Analyze Valiant's motions and memoranda and JV and NIR's oppositions to motion alter/reconsider order of sale to the same in preparation for hearing; outline arguments, perform additional legal research and otherwise prepare for hearing in support of motion to alter order of sale; confer with J. Sykes
09/30/2015	10	\$250.00	1.1	\$275.00	Prepare meet and confer correspondence to S. Weeks
09/30/2015	10	\$250.00	2.8	\$700.00	Analyze VP/NIR motions to reconsider
09/30/2015	10	\$250.00	0.3	\$75.00	Analyze/draft/edit opposition to VP/NIR's new motion to reconsider
10/13/2015	10	\$250.00	1.1	\$275.00	Draft letter to S. Weeks regarding whether VP still intends to cancel the motions to reconsider
10/13/2015	10	\$250.00	1.3	\$325.00	Analyze NIR and VP motion for additional time
10/13/2015	10	\$250.00	0.2	\$50.00	Outline objections to the same
10/13/2015	10	\$250.00	0.4	\$100.00	Email the same to client
10/14/2015	10	\$250.00	1.5	\$375.00	Telephone conference with client regarding the same
					Analyze VP and NIR's opposition to motion for summary judgment and supporting affidavits

10/15/2015	15	\$195.00	2.1	\$409.50	Opp to NIR/VP's Rule 56(f) & Motion Extend Time under Rule 6(e)(1)
10/15/2015	15	\$195.00	2.9	\$565.50	Research regarding 56(f) requirements
10/16/2015	15	\$195.00	0.2	\$39.00	Analysis of NIR/VP opp 3rd SJ Motion
10/18/2015	15	\$195.00	0.5	\$97.50	Analysis of NIR/VP opp to Valiant's 3rd SJ
10/18/2015	15	\$195.00	2.6	\$507.00	Begin draft Reply to NIR/JV Opp to 3rd SJ Motion
10/19/2015	15	\$195.00	5.6	\$1,092.00	Begin drafting Reply in Respond to NIR/VP's Opp to Third SJ Motion
10/19/2015	10	\$250.00	0.2	\$50.00	Email S. Weeks regarding deposition of NIR and VP
10/20/2015	15	\$195.00	0.4	\$78.00	Research Re: 56(f) standards
10/21/2015	15	\$195.00	1.9	\$370.50	Reply to NIR-VP's Opp to Valiant's First Motion to Strike
10/21/2015	10	\$250.00	3.3	\$825.00	Analyze/draft/edit motions to strike and memoranda in support of the same
10/21/2015	10	\$250.00	0.6	\$125.00	Draft/analyze/finalize motions to strike and memoranda affidavits in support of the same
10/27/2015	10	\$250.00	0.2	\$50.00	Analyze email from S. Weeks regarding deposition dates for NIR and VP
10/29/2015	10	\$250.00	1.1	\$275.00	Analyze discovery requests from NIR and VP
10/29/2015	10	\$250.00	0.2	\$50.00	Email the same to client
11/02/2015	10	\$250.00	0.5	\$125.00	Analyze email from S. Weeks and voicemail from the same regarding deposition dates and analyze/draft response to the same
11/05/2015	10	\$250.00	0.5	\$125.00	telephone conference with S. weeks regarding deposition availability and analyze email from S. Weekas regarding the same
<b>Subtotal of Fees</b>			<b>206.70</b>	<b>\$44,932.00</b>	
<b>NIR's Pro Rata Share</b>			<b>50.0%</b>	<b>103.35</b>	<b>\$22,466.00</b>

**Subsection C-3**  
**GENESIS v. POBD**  
**Case No. CV 09-1910**  
Fees Attributed Jointly to NIR and JV

Trans Date	Atty	Rate	Hours to Bill	Amount	
10/29/2012	15	\$190.00	4.6	\$874.00	Compare legal descriptions among lawsuits
10/29/2012	10	\$250.00	0.9	\$225.00	Litigation strategy meeting with C. Nicholson regarding identification of properties subject to cross-claims in case
10/30/2012	15	\$190.00	1.6	\$304.00	Draft memorandum to R. Stacey regarding property involved in various suits; conference with R. Stacey
03/20/2013	10	\$250.00	2.9	\$725.00	Analyze email from client and respond to same; analyze motion to lift MF08 bankruptcy stay; email J. Krause regarding the same; telephone conference with S. Weeks regarding NIR claims; prepare for and participate in conference call with R. Dishnica and J. Holley; draft letter to S. Weeks regarding priority of RE Loans' mortgage based upon subordination agreement; analyze motion for judgment on the pleadings filed by JV, LLC in the Union Bank case
04/12/2013	10	\$170.00	2.2	\$374.00	Outline answer to NIR and JV LLC cross claims
04/16/2013	10	\$170.00	0.2	\$34.00	Analyze pleadings filed for motion on pleadings
04/18/2013	10	\$170.00	0.3	\$136.00	Analyze pleadings in anticipation of answering cross-claims of NIR and JV, LLC
02/18/2014	10	\$250.00	1.3	\$325.00	Analyze JV, LLC and N. Idaho Resorts docs
05/09/2014	10	\$250.00	0.6	\$150.00	Telephone conference with G. Finney regarding possibility of client purchasing note; leave voicemail for S. Weeks regarding the same
05/12/2014	10	\$250.00	0.3	\$75.00	Analyze email from F. Elsaesser and forward and email client regarding the same; leave voicemail for opposing counsel regarding purchase of note
05/14/2014	10	\$250.00	0.3	\$75.00	Telephone conference with S. Weeks regarding sale of note
<b>Subtotal of Fees</b>			<b>15.70</b>	<b>\$3,297.00</b>	
<b>NIR's Pro Rata Share</b>			<b>50.0%</b>	<b>7.85</b>	<b>\$1,648.50</b>

**Subsection C-4**  
**VALIANT FORECLOSURE**  
Fees Attributed Jointly to NIR, VP, and JV

Trans Date	Atty	Rate	Hours to Bill	Amount	
09/02/2014	10	\$270.00	1.4	\$378.00	Analyze pleadings and litigation issues
09/04/2014	10	\$270.00	0.8	\$216.00	Telephone conference with G. Finney regarding 7 day extension to answer complaint; analyze email from client and draft/analyze reply to same; analyze pleadings filed by North Idaho Resorts and HOA related to the motion to substitute Valiant as the real party in interest
09/12/2014	10	\$270.00	2.1	\$567.00	Analyze email from C. Dodson; draft/edit acceptance of service; analyze email from T. McLaughlin regarding issues with maintenance facility; telephone conference with G. Finney regarding status of JV, LLC answer and request extension on behalf of ACI; analyze letter from HOA and email client regarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. Lynskay; analyze amended litigation guarantee; email client
09/17/2014	6	\$160.00	0.6	\$96.00	Study matrix for deadlines; revise same
10/07/2014	10	\$270.00	3.1	\$837.00	Analyze/draft/edit affirmative defenses to JV cross claim; analyze/edit

					answer to JV, LLC claims; analyze motion filed by VP, LLC; w/ J. Breaux re: golf course; t/c and emails with client; confer w/ J. Sykes
10/08/2014	6	\$160.00	0.6	\$96.00	Strategy conference with R. Stacey
11/20/2014	10	\$270.00	2.3	\$621.00	Draft/analyze/edit motion to amend third party complaint; research same; analyze service issues
11/26/2014	6	\$270.00	0.4	\$108.00	Confer with R. Stacey; study scheduling order
12/03/2014	6	\$270.00	4.2	\$1,134.00	Begin study of real property record
12/04/2014	6	\$270.00	3.2	\$864.00	Continue study of real property records
12/05/2014	6	\$270.00	3.4	\$918.00	Study pleadings in prior cases related to summary judgment motions
12/09/2014	6	\$270.00	3.4	\$918.00	Begin preparation of statement of facts for summary judgment motion
12/10/2014	8	\$270.00	5.2	\$1,404.00	Study Reeves affidavit and pleadings; continue preparation of statement of facts
12/11/2014	10	\$270.00	2.6	\$702.00	Analyze project documents; outline summary judgment arguments; draft notice of appearance on behalf of HLT and Independent Mortgage; draft/analyze/edit stipulation to judgment against HOA and Panhandle Management
12/11/2014	6	\$270.00	3.1	\$837.00	Research legal arguments for summary judgment motion and supporting pleadings
12/12/2014	6	\$270.00	2.2	\$594.00	Begin preparation of summary judgment motion and supporting pleadings; legal arguments
12/15/2014	6	\$270.00	7.4	\$1,998.00	Continue preparation of summary judgment; revise statement of facts and legal argument
12/18/2014	10	\$270.00	2.4	\$648.00	Confer with J. Sykes; analyze project documents; analyze legal description
12/16/2014	6	\$270.00	2.1	\$567.00	Research issues related to summary judgment motion
12/16/2014	8	\$270.00	4.2	\$1,134.00	Study research memorandum and related regulations
12/17/2014	6	\$270.00	6	\$1,620.00	Continue preparation of summary judgment motion and supporting pleadings; telephone conference with J. Hamilton; study real property records
12/22/2014	10	\$270.00	0.6	\$182.00	Research motion for judgment on the pleadings
12/30/2014	6	\$270.00	3.4	\$918.00	Prepare declarations to support summary judgment memorandum
12/30/2014	6	\$270.00	3.2	\$864.00	Prepare interrogatories, requests for production and requests for admission to propound upon JV, North Idaho Resorts and VP
01/05/2015	6	\$270.00	0.9	\$243.00	Telephone conference with clients
01/05/2015	6	\$270.00	3.1	\$837.00	Continue preparation of summary judgment briefing
01/05/2015	6	\$270.00	1.2	\$324.00	Correspondence with client; research foreclosure sale issues
01/06/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes
01/09/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes regarding summary judgment issues
01/09/2015	6	\$270.00	3.9	\$1,053.00	Review and revise memorandum in support of motion for summary judgment
01/12/2015	6	\$270.00	5.2	\$1,404.00	Revise summary judgment memorandum; study Union Bank case
01/12/2015	6	\$270.00	0.3	\$81.00	Telephone conference with D. Shafer
01/13/2015	6	\$270.00	3.3	\$891.00	Continue drafting summary judgment memorandum and supporting pleadings
01/14/2015	6	\$270.00	5	\$1,350.00	Prepare summary judgment supporting declaration of counsel; revise summary judgment memorandum
01/15/2015	6	\$270.00	4.8	\$1,296.00	Revise summary judgment legal arguments; final declaration of counsel
01/16/2015	6	\$270.00	3.5	\$945.00	Telephone conference with client; final summary judgment pleadings
01/16/2015	6	\$250.00	2.9	\$725.00	Prepare documents requested by client
01/20/2015	6	\$250.00	3.2	\$800.00	Prepare discovery requests to propound upon JV, NIR and VP
01/20/2015	6	\$250.00	1.3	\$325.00	Outline argument for summary judgment hearing
01/21/2015	6	\$270.00	0.6	\$162.00	Telephone conference with D. Shafer
01/21/2015	6	\$250.00	2.7	\$675.00	Review and revise discovery requests to JV, NIR and VP
01/22/2015	6	\$250.00	0.5	\$125.00	Correspondence with clients
01/23/2015	6	\$250.00	2.6	\$625.00	Revise discovery requests [interrogatories, requests for production and requests for admission] to propound upon JV, NIR and VP
01/26/2015	6	\$250.00	2.7	\$675.00	Final discovery requests for service upon JV, NIR and VP
02/03/2015	18	\$100.00	3.8	\$380.00	Research requirements related to clubhouse
02/03/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes regarding litigation
02/04/2015	18	\$100.00	4.1	\$410.00	Review case law; outline argument
02/05/2015	10	\$250.00	2.1	\$525.00	Review/analyze Summary Judgment responses
02/05/2015	10	\$250.00	0.3	\$75.00	Email client regarding same
02/05/2015	18	\$100.00	3.9	\$390.00	Draft research memorandum
02/06/2015	10	\$270.00	0.6	\$162.00	Analyze emails from client and confer with J. Sykes regarding same
02/09/2015	6	\$250.00	0.9	\$225.00	Prepare stipulation to reschedule summary judgment hearing
02/12/2015	6	\$250.00	0.2	\$50.00	Correspondence with S. Weeks and G. Finney regarding possible settlement conference
02/13/2015	6	\$250.00	0.9	\$225.00	Correspondence with clients
02/18/2015	6	\$270.00	2.6	\$702.00	Correspondence with client; review plat map; telephone conference with D. Shafer
02/19/2015	6	\$270.00	1.1	\$297.00	Correspondence with D. Shafer regarding expert issues
02/23/2015	10	\$250.00	0.9	\$225.00	Review/analyze emails from client and analyze/draft responses to the same
02/23/2015	10	\$250.00	2.1	\$525.00	Review/analyze memorandums filed in opposition to client's motions for summary judgment
02/24/2015	5	\$250.00	4.2	\$1,050.00	Continue preparation of reply memoranda to summary judgment oppositions by JV, NIR and VP
02/24/2015	6	\$270.00	2.2	\$594.00	Prepare letter to Fidelity
03/03/2015	6	\$250.00	2.8	\$700.00	Prepare correspondence to Fidelity
03/11/2015	6	\$250.00	2.2	\$550.00	Begin preparation for hearing on summary judgment motions
03/12/2015	6	\$250.00	0.3	\$75.00	Correspondence with D. Shafer
03/12/2015	6	\$270.00	0.3	\$81.00	Correspondence with D. Shafer regarding expert issues
03/13/2015	6	\$250.00	1.2	\$300.00	Telephone conference with B. Kramer and W. Haberman
03/16/2015	6	\$250.00	0.7	\$175.00	Continue preparation for hearing on summary judgment motions
03/16/2015	10	\$250.00	0.6	\$150.00	Travel to and from meeting with D. Shafer
03/16/2015	10	\$250.00	1.7	\$425.00	Prepare for and attend meeting with D. Shafer

03/16/2015	10	\$250.00	0.6	\$150.00	Analyze documents from D. Shafer
03/16/2015	6	\$250.00	2	\$500.00	Appear for/attend hearing
03/16/2015	6	\$250.00	0.2	\$50.00	Telephone conference with D. Shafer
03/16/2015	6	\$250.00	0.5	\$125.00	Review/analyze maps
03/16/2015	10	\$270.00	0.6	\$162.00	Travel to and from meeting with D. Shafer
03/16/2015	10	\$270.00	1.7	\$459.00	Prepare for and attend meeting with D. Shafer regarding expert issues
03/16/2015	10	\$270.00	0.6	\$162.00	Analyze documents from D. Shafer
03/16/2015	6	\$270.00	0.2	\$54.00	Telephone conference with D. Shafer
03/16/2015	6	\$270.00	0.5	\$135.00	Review/analyze documentation prepared by D. Shafer
03/17/2015	10	\$250.00	0.2	\$50.00	Telephone conference with B. Anderson regarding status of hearing
03/17/2015	6	\$250.00	3.5	\$875.00	Travel to Spokane, Washington for summary judgment hearing
03/18/2015	6	\$250.00	6.5	\$1,625.00	Travel to Sandpoint, Idaho for summary judgment hearing and return to Spokane, Washington
03/18/2015	6	\$250.00	3.2	\$800.00	Prepare for summary judgment hearing
03/18/2015	6	\$250.00	0.7	\$175.00	Telephone conference with clients following summary judgment hearing
03/19/2015	6	\$250.00	3.5	\$875.00	Return to Boise, Idaho from Spokane, Washington
03/19/2015	6	\$250.00	0.2	\$50.00	Review and respond to correspondence from W. Haberman
03/23/2015	6	\$250.00	2.1	\$525.00	Review correspondence from and telephone conference with D. Shafer
03/23/2015	6	\$270.00	2.1	\$567.00	Review correspondence from and telephone conference with D. Shafer
03/24/2015	6	\$270.00	1.1	\$297.00	Correspondence with B. Kramer; telephone conference with S. Nieman
03/24/2015	6	\$270.00	1.3	\$486.00	Correspondence with D. Shafer regarding expert issues; correspondence with clients regarding same
03/24/2015	6	\$250.00	0.9	\$225.00	Correspondence with D. Shafer
03/24/2015	6	\$250.00	0.6	\$150.00	Review matrix of properties
03/24/2015	6	\$250.00	0.3	\$75.00	Correspondence with clients
03/25/2015	6	\$250.00	0.2	\$50.00	Telephone conference with D. Shafer
03/25/2015	6	\$270.00	0.7	\$189.00	Correspondence with B. Kramer; telephone conference with J. Miller; telephone conference with S. Nieman
03/25/2015	6	\$270.00	0.2	\$54.00	Telephone conference with D. Shafer regarding expert issues
03/26/2015	6	\$270.00	0.9	\$243.00	Telephone conference with D. Shafer; review documentation; correspondence with clients regarding same
03/26/2015	6	\$250.00	1.3	\$325.00	Prepare correspondence to D. Kræffels
03/26/2015	6	\$250.00	0.4	\$100.00	Review email correspondence
03/26/2015	6	\$250.00	0.4	\$100.00	Telephone conference with D. Shafer
03/26/2015	6	\$250.00	0.3	\$75.00	Review maps
03/26/2015	6	\$250.00	0.2	\$50.00	Correspondence with clients
03/30/2015	10	\$250.00	2.1	\$525.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6	\$250.00	0.6	\$150.00	Telephone conference with D. Shafer
03/30/2015	6	\$250.00	0.6	\$150.00	Study drawings
03/30/2015	6	\$250.00	0.4	\$100.00	Telephone conference with clients regarding same
03/30/2015	10	\$270.00	2.1	\$567.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6	\$270.00	1.6	\$432.00	Telephone conference with D. Shafer regarding expert issues; telephone conference with clients regarding same
03/31/2015	6	\$250.00	0.8	\$200.00	Telephone conference with D. Shafer and W. Haberman
03/31/2015	6	\$270.00	0.8	\$216.00	Telephone conference with D. Shafer and W. Haberman
04/03/2015	6	\$270.00	1.2	\$324.00	Review/analyze documentation prepared by D. Shafer
04/03/2015	6	\$270.00	0.6	\$162.00	Telephone conference with D. Shafer
04/06/2015	6	\$270.00	0.4	\$108.00	Telephone conference with S. Nieman
04/06/2015	10	\$270.00	2.7	\$729.00	Analyze documentation prepared by D. Shafer; prepare outline regarding the same; telephone conference with D. Shafer regarding the same
04/08/2015	6	\$270.00	0.3	\$81.00	Prepare letter to S. Nieman
04/10/2015	6	\$270.00	0.9	\$243.00	Telephone conference with D. Shafer regarding expert issues
04/14/2015	6	\$270.00	1.1	\$297.00	Begin preparation of Shafer declaration
04/15/2015	6	\$270.00	0.2	\$54.00	Telephone conference with D. Shafer regarding expert issues
04/15/2015	6	\$250.00	0.5	\$125.00	Correspondence with clients
04/15/2015	6	\$250.00	1.1	\$275.00	Study summary judgment ruling
04/16/2015	6	\$250.00	0.2	\$50.00	Telephone conference with T. McLaughlin
04/16/2015	6	\$250.00	0.3	\$75.00	Correspondence with client
04/16/2015	10	\$270.00	1.6	\$432.00	Analyze Summary Judgment decision; email client regarding the same and analyze responses
04/17/2015	10	\$270.00	1.6	\$432.00	Prepare for and attend conference call with clients
04/17/2015	6	\$270.00	1.1	\$297.00	Telephone conference with B. Kramer and others
04/21/2015	6	\$250.00	0.4	\$100.00	Correspondence with Fidelity
04/24/2015	10	\$270.00	1.6	\$372.00	Confer with J. Sykes regarding litigation
04/24/2015	6	\$270.00	1.3	\$351.00	Confer with R. Stacey regarding litigation
04/27/2015	10	\$270.00	0.9	\$243.00	Telephone conference with B. Haberman regarding summary judgment; confer with J. Sykes regarding same; email client; analyze client response
05/06/2015	10	\$270.00	3.3	\$891.00	Confer with J. Sykes regarding issues related to litigation
05/07/2015	10	\$270.00	0.5	\$162.00	Analyze emails from client; email client regarding the same
05/08/2015	10	\$270.00	3.6	\$972.00	Research legal issues related to summary judgment
05/09/2015	10	\$270.00	0.1	\$27.00	Analyze email from client; email J. Sykes regarding same
05/11/2015	10	\$270.00	4.1	\$1,107.00	Analyze information from D. Shafer; outline Shafer declaration; analyze email from opposing counsel
06/17/2015	15	\$225.00	5.7	\$1,282.50	Travel from Boise to Sandpoint, prepare for hearing, attend hearing, telephone conference with Brian Kramer
06/17/2015	10	\$270.00	0.6	\$162.00	Confer with C. Nicholson regarding outcome of hearing on motion for final judgment
06/18/2015	15	\$225.00	2.1	\$472.50	E-mail hearing update to B. Haberman; travel Spokane to Boise
06/22/2015	15	\$195.00	2.8	\$546.00	Research motion to reconsider
06/22/2015	15	\$195.00	1.9	\$370.50	Research motion to reconsider and opposition to summary judgment
06/23/2015	6	\$250.00	1.7	\$425.00	Analyze client documents and property records
06/23/2015	6	\$250.00	0.2	\$50.00	Correspondence with clients
06/23/2015	15	\$195.00	1.7	\$331.50	Research regarding standard of review for 11(a)(2)(B) motion

06/23/2015	10	\$250.00	1	\$250.00	Analyze memorandum decision and order and confer with J. Sykes regarding the same
06/23/2015	10	\$250.00	0.4	\$100.00	Email client
06/23/2015	15	\$225.00	0.1	\$22.50	Review of Memorandum Decision and Order regarding motion for Entry of Final Judgment
06/23/2015	6	\$270.00	1.2	\$324.00	Review draft of final judgment; correspondence with Fidelity
06/24/2015	15	\$195.00	0.9	\$175.50	Begin drafting memoranda in opposition to JV/VP/NIR motion to reconsider
06/24/2015	15	\$195.00	0.8	\$156.00	Research I.C. 55-806
06/24/2015	15	\$195.00	1.4	\$273.00	Continue drafting memoranda in Opposition to JV/VP/NIR Motions to Reconsider
06/24/2015	15	\$195.00	0.5	\$97.50	Research standard of review
06/24/2015	15	\$195.00	1.3	\$253.50	Research standard of review
06/25/2015	15	\$195.00	3.2	\$624.00	Continue drafting memoranda in opposition to JV/VP/NIR Motions to Reconsider
06/25/2015	15	\$195.00	0.8	\$156.00	Review of Chuck Reeves deposition from Union Bank case
06/25/2015	15	\$195.00	1.2	\$234.00	Research submission of admissible evidence
06/26/2015	15	\$195.00	7.2	\$1,404.00	Continue Drafting memoranda in opposition to JV/VP/NIR Motions to reconsider
06/26/2015	6	\$250.00	1.5	\$375.00	Draft affidavits and motion in support of motions to reconsider
06/26/2015	10	\$250.00	0.5	\$125.00	Telephone conference with client
06/29/2015	15	\$195.00	1.6	\$312.00	Finish Drafting memoranda in opposition to JV/VP/NIR Motions to Reconsider
06/29/2015	6	\$250.00	1.9	\$475.00	Revise motions and affidavits in support of oppositions to motions to reconsider
06/29/2015	10	\$250.00	0.6	\$150.00	Confer with J. Sykes and C. Nicholson
06/30/2015	10	\$270.00	0.4	\$108.00	Conference call with D. Shafer
06/30/2015	10	\$270.00	1	\$270.00	Research statute of frauds
07/01/2015	10	\$250.00	2.8	\$700.00	Analyze/draft/edit/finalize affidavits in support of memorandums in opposition to motions to reconsider
07/02/2015	10	\$270.00	0.3	\$81.00	Analyze emails from D. Shafer to R. Lynskey; email D. Shafer regarding the same
07/04/2015	10	\$270.00	0.1	\$27.00	Analyze email from B. Haberman
07/06/2015	10	\$270.00	2.4	\$648.00	Analyze site maps and other documents from D. Shafer; analyze multiple emails from D. Shafer; draft responses to same; (3) telephone conference with D. Shafer; email B. Haberman; analyze multiple emails from B. Haberman and respond to the same
07/06/2015	10	\$250.00	1.1	\$275.00	Review/analyze issues with service of oppositions to motion to reconsider
07/06/2015	10	\$250.00	1.4	\$350.00	Draft/revise motion to vacate hearing date to serve opposition briefing
07/07/2015	10	\$250.00	3.1	\$775.00	Prepare for motion to reconsider
07/07/2015	10	\$250.00	0.3	\$75.00	Telephone conference with court clerk regarding waiver of objection for untimely filing
07/07/2015	10	\$250.00	0.1	\$25.00	Analyze email from clerk regarding waiver of objection for untimely filing
07/07/2015	10	\$250.00	0.3	\$75.00	Email client regarding status
07/07/2015	6	\$270.00	0.6	\$162.00	Confer with R. Stacey
07/08/2015	6	\$270.00	0.9	\$243.00	Research tax deeds; confer with R. Stacey regarding same
07/08/2015	15	\$225.00	0.2	\$45.00	Analysis of redemption deed statutes with J. Sykes
07/08/2015	10	\$270.00	0.8	\$162.00	Analyze emails from D. Shafer and respond to the same; analyze email from D. Staples; telephone conference with W. Haberman re same; analyze emails from W. Haberman
07/08/2015	10	\$250.00	3.7	\$2,425.00	Travel to and from Sandpoint, Idaho
07/08/2015	10	\$250.00	3.4	\$850.00	Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider
07/09/2015	10	\$250.00	2.7	\$675.00	Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same
07/09/2015	10	\$250.00	0.3	\$75.00	Analyze email from client
07/09/2015	10	\$250.00	0.2	\$50.00	Draft/analyze response to client email
07/09/2015	10	\$270.00	3.9	\$1,053.00	Prepare for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer and B. Haberman; analyze documents from D. Shafer; analyze property on Bonner County Assessor's website
07/10/2015	10	\$270.00	2.9	\$783.00	Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer
07/13/2015	10	\$270.00	4.3	\$1,161.00	Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman; draft/analyze email to him regarding the same
07/22/2015	6	\$270.00	1.1	\$297.00	Review scheduling order; attend pretrial conference
07/22/2015	15	\$225.00	1.7	\$382.50	Research regarding water rights; telephone conference regarding same;
07/22/2015	10	\$270.00	6.1	\$1,647.00	Outline changes to judgment and foreclosure decree per court's memorandum decision; analyze emails from C. Reeves and client; confer with C. Nicholson and J. Sykes regarding the same; draft/analyze multiple emails to clients regarding same; confer with local counsel regarding the same; analyze emails from client and C. Reeves; perform legal research re same; analyze documents from D. Shafer and forward same to client
07/22/2015	10	\$250.00	2.9	\$725.00	Analyze decision denying motions to reconsider
07/22/2015	10	\$250.00	1	\$250.00	Email and telephone conferences (3) with client
07/23/2015	10	\$250.00	1.6	\$400.00	Analyze/draft/edit changes to the judgment per court's memorandum decision denying motion to reconsider.
07/23/2015	10	\$270.00	3.3	\$891.00	Analyze/draft/edit changes to the decree of foreclosure per court's memorandum decision; analyze litigation guarantees; request copies of recorded instruments from First American
07/23/2015	6	\$270.00	0.6	\$162.00	Review/analyze judgment and order of sale
07/24/2015	15	\$225.00	1.4	\$315.00	Research water rights



07/24/2015	10	\$270.00	4.1	\$1,107.00	Analyze documents from B. Haberman; email D. Shafer; analyze emails from D. Shafer regarding same; verify accuracy of plats; research legal issues
07/24/2015	6	\$270.00	0.4	\$108.00	Review/analyze decree of foreclosure
07/27/2015	10	\$270.00	0.4	\$108.00	Analyze emails from B. Haberman and respond to the same; analyze email from R. Myers and respond to the same
07/28/2015	6	\$250.00	2.1	\$525.00	Prepare correspondence regarding decisions issued by court on motions for reconsideration
07/28/2015	10	\$250.00	0.2	\$50.00	Analyze emails from R. Meyers and B. Haberman
07/29/2015	10	\$270.00	1.6	\$432.00	Analyze email from R. Myers; analyze email from B. Haberman; analyze emails from B. Haberman to R. Myers; email B. Haberman; prepare for and telephone conference with B. Haberman; email title company; analyze court order vacating hearing on proposed order of sale and requesting Order for entry granting the same; telephone conference with (2) court clerk and advise of preference for hearing to proceed
07/30/2015	10	\$270.00	0.8	\$216.00	Email R. Myers regarding teleconference to discuss status of case; email B. Haberman regarding the same; analyze email from B. Haberman; leave voicemail for court clerk re: order vacating hearing on proposed order of sale; telephone conference with court clerk regarding the same
07/31/2015	10	\$250.00	2.4	\$600.00	Analyze documents from Bonner County Assessor
08/03/2015	10	\$270.00	1.6	\$432.00	Analyze utility easement documents
08/05/2015	10	\$270.00	11.6	\$3,132.00	Prepare for hearing; travel to Sandpoint, ID and back to Boise, ID; attend and argue in favor of motion at hearing; coordinate with court for execution of judgment; deliver and record judgment at Bonner County Recorder's Office; telephone conference with B. Kramer regarding outcome of hearing; B. Haberman regarding outcome of hearing
08/06/2015	18	\$100.00	6.1	\$610.00	Research foreclosure sales
08/06/2015	15	\$225.00	3.1	\$697.50	Research regarding foreclosure sales
08/06/2015	10	\$250.00	0.2	\$50.00	Analyze email from Fidelity
08/07/2015	18	\$100.00	5.5	\$550.00	Research credit bidding
09/02/2015	10	\$270.00	3.3	\$2,241.00	Travel from Boise, ID to Sandpoint, Idaho for the motion to alter/reconsider order of sale; prepare for hearing on Valiant's motion to alter or reconsider foreclosure decree and order of sale; confer with J. Sykes regarding the same; telephone conference with clients;
09/02/2015	6	\$250.00	2.7	\$675.00	Prepare for hearing on third motion for reconsideration
09/02/2015	6	\$250.00	3.2	\$800.00	Travel from Boise to Sandpoint, Idaho for hearings
09/02/2015	6	\$250.00	1.7	\$425.00	Attend hearings
09/02/2015	6	\$250.00	1.6	\$400.00	Telephone conference with clients regarding outcome of hearings
09/03/2015	6	\$250.00	3.2	\$800.00	Return to Boise from Sandpoint, Idaho
09/03/2015	10	\$250.00	0.2	\$50.00	Analyze emails and attachments from B. Haberman
09/03/2015	10	\$250.00	1	\$250.00	Telephone conference with B. Haberman
09/03/2015	10	\$250.00	3	\$750.00	Travel from Sandpoint, ID to Boise, ID
09/03/2015	15	\$225.00	0.2	\$45.00	Respond to clients' request for documents
09/04/2015	10	\$250.00	1.9	\$475.00	Analyze court ruling granting motion to reconsider
09/09/2015	10	\$250.00	0.3	\$75.00	Telephone conference with B. Haberman
09/09/2015	10	\$250.00	0.5	\$125.00	Analyze order setting trial and pretrial order
09/10/2015	10	\$250.00	6.6	\$1,650.00	Analyze Pensco and MF08 loan documents, real property records and other documents of record in this case in preparation for motion to reconsider and in support of motion for summary judgment and confer with C. Nicholson regarding the same
09/14/2015	15	\$195.00	1.8	\$351.00	Begin drafting Memo Supp. Motion to Reconsider the Court's 9-4-15 decision; confer with J. Sykes and R. Slacey
09/14/2015	10	\$250.00	1.4	\$350.00	Outline arguments for motion to reconsider
09/14/2015	10	\$250.00	2.4	\$600.00	Outline arguments for motion for summary judgment
09/14/2015	10	\$250.00	1.5	\$375.00	Meet to discuss motion to reconsider, summary judgment and objection to proposed judgment
09/14/2015	6	\$250.00	1.9	\$475.00	Outline issues for third summary judgment motion
09/15/2015	15	\$195.00	0.2	\$39.00	Discuss research project with C. Tipton
09/15/2015	15	\$195.00	0.8	\$156.00	Review and analysis of MF08 All-Inclusive Mortgage & Loan Agreement to prepare B. Ng Decl.
09/15/2015	15	\$195.00	0.8	\$156.00	Begin preparing Ng Decl.
09/15/2015	18	\$100.00	2.3	\$230.00	Discussion with C. Nicholson; Research regarding inconsistent declarations
09/16/2015	18	\$100.00	3.8	\$380.00	Discussion with C. Nicholson; Research regarding inconsistent declarations
09/16/2015	15	\$195.00	3.5	\$682.50	Draft Barney Ng decl.
09/17/2015	15	\$195.00	0.2	\$39.00	Correspondence with W. Haberman
09/17/2015	15	\$195.00	0.3	\$58.50	Review and analyze: POBD mortgages with R.E. Loans, MF08 & Pensco
09/17/2015	15	\$195.00	1.3	\$253.50	Review and analyze loan agreements between POBD and RE Loans/MF08
09/17/2015	15	\$195.00	0.9	\$175.50	Review and analysis of notes between POBD & RE Loans, Pensco & MF08
09/17/2015	15	\$195.00	0.6	\$117.00	Review and analysis of Pensco related documents received from B. Ng
09/17/2015	15	\$195.00	2.1	\$409.50	Review, analyze and compare Borrowers Funding Authorization & Analyze with Settlement Statement relied upon by VP/NIR/JV and other closing documents (check stub to POBD, CA disclosure form, etc.)
09/17/2015	6	\$250.00	0.3	\$75.00	Review scheduling order regarding expert disclosures
09/17/2015	6	\$250.00	3.2	\$800.00	Study second summary judgment motion and supporting pleadings
09/17/2015	6	\$250.00	0.9	\$225.00	Telephone conference with F. Elsaesser
09/17/2015	6	\$250.00	0.3	\$75.00	Telephone conference with W. Haberman
09/17/2015	18	\$100.00	4.5	\$450.00	Research/Draft Argument regarding inconsistent Decl.
09/17/2015	6	\$270.00	1.2	\$324.00	Telephone conference with F. Elsaesser regarding summary judgment motion; telephone conference with W. Haberman
09/18/2015	15	\$195.00	0.1	\$19.50	Review Notice regarding proposed Judgment between VP, NIR & JV.

				order vacating 3/5/15 Judgment, and order vacating 8/5/15 decree of foreclosure	
09/18/2015	18	\$100.00	1.2	\$120.00	Research regarding inconsistent Decl.
09/18/2015	15	\$195.00	0.8	\$156.00	Telephone conference with J. Sykes, W. Haberman and E. Ford
09/19/2015	15	\$195.00	2.4	\$468.00	Continue drafting Ng declaration
09/19/2015	6	\$250.00	1.4	\$350.00	Revise declaration of B. Ng
09/19/2015	6	\$250.00	0.3	\$75.00	Telephone conference with F. Elsaesser
09/19/2015	15	\$195.00	0.2	\$99.00	Correspondence with Janet Robnett regarding representation of POBD in conjunction with closing of RE Loans, Pansco and MF08 loans
09/20/2015	15	\$195.00	1.3	\$253.50	Complete initial draft of Ng Decl.
09/21/2015	15	\$195.00	0.9	\$175.50	Prepare for and telephone conference with J. Sykes, W. Haberman and B. Ng
09/21/2015	15	\$195.00	0.3	\$58.50	Review correspondence from W. Haberman
09/21/2015	15	\$195.00	1.8	\$351.00	Revise Ng Decl.
09/21/2015	15	\$195.00	0.2	\$99.00	Draft Third Motion for Summary Judgment
09/21/2015	15	\$195.00	2	\$390.00	Begin Drafting Memo. Supp. 3rd Mot. for Summary Judgment
09/21/2015	6	\$250.00	1.2	\$300.00	Telephone conference with B. Ng
09/21/2015	16	\$100.00	3.2	\$620.00	Research/Draft Argument regarding inconsistent Decl.
09/22/2015	18	\$100.00	3.2	\$320.00	Research regarding inconsistent Decl.
09/22/2015	6	\$270.00	0.9	\$243.00	Correspondence with S. Rasor
09/22/2015	6	\$270.00	1.1	\$297.00	Prepare documents for Rasor review
09/22/2015	15	\$195.00	0.8	\$156.00	Finish revisions to second draft of Ng Declaration
09/22/2015	15	\$195.00	5.1	\$994.50	Continue draft Memo Supp 3rd MSJ
09/22/2015	6	\$250.00	0.7	\$175.00	Review and revise declaration of B. Ng
09/22/2015	6	\$250.00	1.4	\$350.00	Correspondence with G. Finney regarding depositions of C. Reeves and First American
09/22/2015	6	\$250.00	0.3	\$200.00	Correspondence with W. Haberman
09/22/2015	6	\$250.00	0.3	\$75.00	Correspondence regarding Reeves deposition
09/23/2015	15	\$195.00	3.3	\$1,618.50	Continue draft Summary Judgment
09/23/2015	15	\$195.00	0.6	\$117.00	Strategy discussion with J. Sykes and C. Tipton
09/23/2015	18	\$100.00	10.2	\$1,020.00	Draft Memo/Argument regarding Shafer Decl.
09/24/2015	15	\$195.00	5.1	\$1,189.50	Finish drafting Memo Supp. 3rd Summary Judgment
09/24/2015	6	\$250.00	3.9	\$975.00	Review and revise summary judgment memorandum and supporting pleadings
09/25/2015	6	\$250.00	0.2	\$50.00	Correspondence with S. Rasor
09/29/2015	10	\$250.00	2.7	\$675.00	Outline discovery to NIR and JV, LLC
09/29/2015	10	\$250.00	0.7	\$175.00	Analyze scheduling order
09/29/2015	10	\$250.00	1.3	\$325.00	Outline deposition notices to C. Reeves and R. Villali
09/29/2015	6	\$250.00	1.2	\$300.00	Outline issues regarding depositions, discovery and summary judgment motion
10/01/2015	10	\$250.00	3.6	\$900.00	Outline requests for admission and interrogatories to NIR, VP and JV
10/01/2015	10	\$250.00	0.6	\$150.00	Telephone conference with client
10/01/2015	10	\$250.00	1.1	\$275.00	Review/analyze project documents
10/08/2015	10	\$250.00	0.7	\$175.00	Analyze legal descriptions
10/08/2015	10	\$250.00	0.8	\$200.00	Review/analyze emails from D. Shafer
10/08/2015	10	\$250.00	0.5	\$125.00	Telephone conference with D. Shafer
10/11/2015	10	\$250.00	0.2	\$50.00	Review/analyze email from client
10/12/2015	10	\$250.00	0.6	\$150.00	Email clients
10/12/2015	10	\$250.00	0.3	\$75.00	Analyze emails from client regarding the same
10/13/2015	10	\$250.00	0.3	\$75.00	Email C. Reeves regarding availability for deposition
10/14/2015	15	\$195.00	0.7	\$136.50	Review and analysis of Ng Bankruptcy decl.
10/14/2015	6	\$250.00	1.1	\$275.00	Review/analyze pleadings filed by NIR, JV and VP
10/14/2015	6	\$250.00	1.1	\$275.00	Correspondence with client
10/14/2015	10	\$250.00	1.3	\$325.00	Analyze rules of civil procedure and other legal issues
10/14/2015	10	\$250.00	0.9	\$225.00	Telephone conference with B. Haberman
10/14/2015	10	\$250.00	0.4	\$100.00	Analyze emails from B. Haberman
10/14/2015	10	\$250.00	0.4	\$100.00	Analyze pleadings filed by B. Ng
10/14/2015	10	\$250.00	0.3	\$75.00	Draft notice for client to attend hearing telephonically
10/15/2015	6	\$250.00	1.9	\$475.00	Review/analyze correspondence from clients
10/15/2015	10	\$250.00	0.7	\$175.00	Telephone conference with B. Haberman and B. Kramer
10/15/2015	10	\$250.00	1.3	\$450.00	Outline response
10/15/2015	10	\$250.00	0.6	\$150.00	Analyze emails from B. Haberman and B. Kramer
10/15/2015	10	\$250.00	0.6	\$150.00	Analyze/edit additional points
10/15/2015	10	\$250.00	0.2	\$50.00	Telephone conference with B. Haberman
10/15/2015	10	\$250.00	0.2	\$50.00	Analyze email from client
10/15/2015	10	\$250.00	0.3	\$75.00	Telephone conference with M. Hathaway
10/15/2015	10	\$250.00	2.3	\$575.00	Compile documents and email the same to M. Hathaway
10/16/2015	15	\$195.00	1.6	\$312.00	Draft/revise Decl/Aff Opp Third SJ Motion or alternative Request for Extension of Time to reply and revise supporting Nicholson decl
10/16/2015	10	\$250.00	0.6	\$150.00	Analyze emails from B. Haberman and B. Kramer
10/16/2015	10	\$250.00	1.1	\$275.00	Compile documents and email engineer
10/16/2015	10	\$250.00	0.6	\$150.00	Telephone conference with B. Haberman and B. Kramer
10/16/2015	6	\$270.00	1.9	\$613.00	Study FACTO title policies; draft correspondence to FATCC
10/18/2015	15	\$195.00	3.1	\$604.50	Research regarding breach of note/loan agreement
10/19/2015	15	\$195.00	1.3	\$351.00	Research breach of note/loan agreement
10/19/2015	10	\$250.00	1.7	\$425.00	Draft/analyze/edit affidavit of B. Ng
10/19/2015	10	\$250.00	1.1	\$275.00	Analyze documents related the foregoing reply pleadings
10/20/2015	15	\$195.00	1.1	\$214.50	Analysis of exhibits submitted by JV and NIR/VP in opp to 3rd SJ Motion
10/20/2015	15	\$195.00	0.2	\$39.00	Draft Nicholson Decl. Dated 10/20/15
10/20/2015	6	\$250.00	0.3	\$75.00	Review/analyze second Ng declaration
10/20/2015	6	\$250.00	0.3	\$200.00	Prepare status update
10/20/2015	6	\$250.00	4.1	\$1,025.00	Begin preparation for hearings on motions for reconsideration and second summary judgment motion
10/20/2015	10	\$250.00	0.4	\$100.00	Analyze emails from client
10/20/2015	10	\$250.00	0.3	\$75.00	Analyze/draft email to client
10/20/2015	10	\$250.00	0.2	\$50.00	Analyze client responses
10/20/2015	10	\$250.00	0.7	\$175.00	Draft/analyze/edit changes to B. Ng. Decl.

10/20/2015	10	\$250.00	0.2	\$50.00	Email B. Ng
10/20/2015	10	\$250.00	0.2	\$50.00	Telephone conference with B. Ng
10/20/2015	10	\$250.00	0.3	\$75.00	Draft/analyze changes
10/20/2015	10	\$250.00	0.1	\$25.00	Email the modified agreement to B. Ng
10/21/2015	15	\$195.00	0.7	\$136.50	Research regarding residual exception to hearsay rule
10/21/2015	15	\$195.00	0.9	\$175.50	Research regarding admissibility and use of impeachment evidence
10/21/2015	15	\$195.00	0.5	\$97.50	Research regarding business record exception to hearsay rule
10/22/2015	5	\$250.00	2.2	\$550.00	Continue preparation for hearings on motions for reconsideration and second summary judgment motion
10/22/2015	6	\$250.00	3	\$750.00	Travel to Sandpoint, Idaho
10/22/2015	10	\$250.00	5.1	\$1,275.00	Analyze briefing and prepare for hearing on motion for summary judgment
10/22/2015	10	\$250.00	2.9	\$725.00	Travel to Spokane, Washington
10/23/2015	6	\$250.00	5	\$1,250.00	Appear for/attend hearings on motions for reconsideration and second summary judgment motion
10/23/2015	6	\$250.00	1	\$250.00	Telephone conference with clients regarding outcome of hearings
10/23/2015	6	\$250.00	3	\$750.00	Return travel to Boise, Idaho
10/23/2015	10	\$250.00	7.5	\$1,875.00	Prepare for hearing and attend hearing and argue motion for summary judgment
10/23/2015	10	\$250.00	3	\$750.00	Travel to and from Spokane, WA to Sandpoint, ID
10/24/2015	10	\$250.00	3.8	\$950.00	Travel from Spokane, WA to Boise, ID
10/26/2015	15	\$195.00	0.9	\$175.50	Review mortgages
10/26/2015	6	\$250.00	2.9	\$725.00	Correspondence with D. Kreifels
10/26/2015	6	\$250.00	0.4	\$100.00	Review/analyze additional discovery to defendants
10/26/2015	6	\$250.00	0.9	\$225.00	Research issues regarding tax parcel sales
10/26/2015	10	\$250.00	1.1	\$275.00	Analyze previously propounded rogs and rfs
10/26/2015	10	\$250.00	3.1	\$775.00	Draft/analyze/edit rfs and rogs to defendants VP, NIR and JV
10/26/2015	10	\$250.00	0.8	\$200.00	Draft/analyze/edit expert witness disclosures
10/26/2015	10	\$250.00	0.4	\$100.00	Coordinate resumes and other information from experts for expert disclosures
10/26/2015	10	\$250.00	0.4	\$100.00	Draft/analyze/edit lay witness disclosures
10/26/2015	10	\$270.00	3.6	\$972.00	Analyze email from M. Hathaway; telephone conference with M. Hathaway regarding expert witness duties; conference call with M. Hathaway and D. Shafer regarding the same; analyze Shafer exhibits in preparation for conference call; analyze multiple emails back and forth between M. Hathaway and D. Shafer
10/27/2015	10	\$270.00	1.1	\$297.00	Analyze email from counsel for First American; draft/analyze/edit response to the same
10/27/2015	15	\$195.00	4.4	\$658.00	Analysis of documents produced by First American Title Co.
10/27/2015	10	\$250.00	0.3	\$75.00	Draft/analyze notices of service for discovery to JV, NIR and VP
10/27/2015	10	\$250.00	0.3	\$75.00	Draft/analyze email to counsel for First American re: deposition dates
10/27/2015	10	\$250.00	2.7	\$675.00	Analyze documents from Sandpoint Title
10/28/2015	6	\$250.00	1.2	\$300.00	Revise correspondence to D. Kreifels
10/28/2015	10	\$250.00	0.3	\$75.00	Email First American regarding documents produced to JV and NIR
10/28/2015	10	\$250.00	0.2	\$50.00	Analyze response to the same
10/28/2015	10	\$250.00	0.9	\$225.00	Analyze/draft/edit emails to counsel for First American
10/28/2015	10	\$250.00	0.3	\$75.00	Analyze responses to the same
10/28/2015	10	\$250.00	1.4	\$350.00	Compile documentation requested by First American and email the same to counsel for the same
10/28/2015	10	\$250.00	0.5	\$150.00	Compile documentation for D. Shafer
10/28/2015	10	\$250.00	0.3	\$75.00	Analyze email from court clerk
10/28/2015	10	\$250.00	1.6	\$400.00	Analyze emails from client and respond to the same
10/29/2015	10	\$250.00	0.9	\$225.00	Analyze emails (6) from M. Hathaway and D. Shafer
10/29/2015	10	\$250.00	0.3	\$75.00	Prepare for conference call with M. Hathaway and D. Shafer
10/29/2015	10	\$250.00	0.5	\$150.00	Participate in conference call
10/29/2015	10	\$250.00	0.3	\$75.00	Analyze email from G. Edson
10/29/2015	10	\$250.00	0.3	\$75.00	Email G. Edson
10/30/2015	15	\$195.00	0.5	\$97.50	Review of Disclosure Statement for Joint Chapter 11 Plan of Recognition filed in R.E. Loans Texas bankruptcy
10/30/2015	6	\$250.00	0.3	\$200.00	Review and respond to correspondence from D. Kreifels
10/30/2015	10	\$250.00	0.9	\$200.00	Analyze emails and voicemail from G. Edson and leave voicemail in response to the same
11/02/2015	15	\$195.00	2.1	\$409.50	Review/analyze R.E. Loans Bankruptcy filings
11/02/2015	6	\$250.00	1.5	\$400.00	Correspondence to D. Kreifels
11/02/2015	10	\$250.00	0.3	\$150.00	Telephone conference with G. Edson
11/02/2015	10	\$250.00	0.4	\$100.00	Telephone conference and email with client
11/03/2015	15	\$195.00	0.3	\$58.50	Continue Review of RE Loans bankruptcy
11/03/2015	10	\$250.00	0.6	\$150.00	Analyze letter from G. Edson
11/03/2015	10	\$250.00	0.3	\$75.00	Telephone conference and email with client
11/03/2015	10	\$270.00	1.2	\$324.00	Analyze emails from M. Hathaway; respond to same conference call with M. Hathaway and D. Shafer regarding same
11/04/2015	10	\$270.00	1.5	\$405.00	Telephone conference with B. Haberman; telephone conference with Bonnar County regarding tax parcel issues; draft/analyze email to B. Haberman
11/05/2015	10	\$250.00	0.9	\$225.00	Analyze availability and strategy for taking depositions and leave voicemail for D. Marfice regarding deposition dates
11/05/2015	10	\$250.00	0.5	\$125.00	telephone conference with paralegal for Susan Weeks and G. Finney regarding deposition
11/05/2015	10	\$250.00	0.4	\$100.00	telephone conference with P. DeAngeli regarding scope of Lynskey testimony
11/05/2015	10	\$250.00	0.3	\$75.00	Telephone conference with P. DeAngeli
11/05/2015	10	\$250.00	1.2	\$300.00	Analyze Sandpoint Title documents and email from M. Hathaway and telephone conference with Mr. Hathaway
11/10/2015	6	\$250.00	0.3	\$75.00	Revise correspondence with Fidelity
11/10/2015	10	\$250.00	3.7	\$925.00	Analyze FATCO documents and draft deposition outlines for the same
11/11/2015	15	\$195.00	1	\$195.00	Analysis of Court's Decision regarding 3rd MSJ and other motions heard on October 23, 2015

11/11/2015	6	\$250.00	1.2	\$300.00	Study memorandum decision and order on summary judgment motion
12/02/2015	6	\$250.00	0.9	\$225.00	Review/analyze order on summary judgment motion
6/23/2016	10	\$250.00	5.6	\$1,400.00	Research fees/costs
6/24/2016	10	\$250.00	6.1	\$1,525.00	Continue researching fees/costs; outline motion for fees and costs; analyze fee/cost invoices; telephone conference with B. Haberman; confer with J. Sykes; compile invoices
3/27/2016	10	\$250.00	6.3	\$1,575.00	Analyze/draft/edit motion for fees/costs
6/28/2016	10	\$250.00	6.7	\$1,675.00	Continue to analyze/draft/edit motion for fees/costs
6/29/2016	10	\$250.00	7.3	\$1,825.00	Continue to analyze/draft/edit motion for fees/costs
6/30/2016	10	\$250.00	7.8	\$1,950.00	Continue to analyze/draft/edit motion for fees/costs
7/1/2016	10	\$250.00	0.5	\$125.00	Analyze email from client; draft changes to proposal; emails and telephone conference with client
7/1/2016	17	\$90.00	5.5	\$90.00	Compile spreadsheets and organize invoices in support of memorandum of costs and fees
7/2/2016	17	\$90.00	11	\$90.00	Segregate spreadsheets and organize invoices in support of memorandum of costs and fees
7/3/2016	17	\$90.00	6.75	\$90.00	Segregate spreadsheets and organize invoices in support of memorandum of costs and fees; incorporate data within memorandum
7/4/2016	17	\$90.00	11.75	\$90.00	Finalize spreadsheets and identification of invoices in support of memorandum of costs and fees
7/5/2016	10	\$250.00	7.1	\$1,775.00	Analyze/draft/finalize motion for fees/costs
7/5/2016	17	\$90.00	8	\$720.00	Finalize work in connection with exhibits to to memorandum of costs
<b>Subtotal of Fees</b>			<b>749.80</b>	<b>\$168,968.00</b>	
<b>NIR's Pro Rata Share</b>			<b>33.3%</b>	<b>249.93</b>	<b>\$56,222.00</b>
<b>NIR's GRAND TOTAL:</b>			<b>390.03</b>	<b>\$86,417.50</b>	

## EXHIBIT D

**Subsection D-1**  
**VALIANT FORECLOSURE**  
 Fees Attributed to VP

Trans Date	Atty	Rate	Hours to Bill	Amount	
08/06/2014	10	\$270.00	3.4	\$918.00	Analyze email from M. Brennan and respond to same; email W. Haberman; research foreclosure statutes; analyze VP documents; draft, analyze and edit five notices of substitution of counsel for Wells Fargo; telephone conference with P. Ware regarding same; email Messrs Brennan and Haberman
10/08/2014	10	\$270.00	3.1	\$837.00	Analyze VP motion to dismiss; confer w/ J. Sykes; outline opposition to motion to dismiss; email R. Lynskey
10/09/2014	10	\$270.00	1.7	\$459.00	Analyze VP motion to dismiss; confer w/ J. Sykes; analyze/draft/edit email to client; analyze client responses; draft/analyze/edit responses to the same; coordinate conference call.
10/13/2014	8	\$160.00	4.9	\$794.00	Begin preparation of motion to amend and objection to motion to dismiss third party complaint; research memorandum
10/15/2014	8	\$160.00	1.9	\$304.00	Conference call with client; continue preparation of motion to amend and opposition to motion to dismiss
10/21/2014	15	\$225.00	1.7	\$382.50	Analyze legal issues
10/21/2014	8	\$160.00	4.2	\$672.00	Continue preparation of opposition to motion to dismiss/motion to amend (1.1); multiple telephone conferences with clients (.9); begin research of statute of limitations issues (2.2)
10/21/2014	10	\$270.00	2.9	\$783.00	E-mail to client; confer with J. Sykes; analyze emails from clients; t/c with clients analyze statutes
10/22/2014	6	\$160.00	3.1	\$496.00	Review all parties' pleadings for opposition to motion to dismiss and motion to amend, and incorporate same; correspondence with clients
10/22/2014	10	\$270.00	4.9	\$1,323.00	Research; analyze pleadings filed by RE Loans; analyze RE Loans docs; confer w/ J. Sykes; analyze multiple emails from client; analyze/draft/edit responses to the same; set up conference call w/ clients; email counsel for C. Reeves
10/23/2014	6	\$160.00	4.2	\$672.00	Telephonic meeting with clients; continue research of legal issues; study loan documents
10/23/2014	10	\$270.00	1.9	\$513.00	Prepare for conference call with client; t/c W. Haberman and B. Kramer; analyze email from client in follow-up to same
10/24/2014	15	\$225.00	3.4	\$765.00	Research and draft memorandum
10/27/2014	6	\$160.00	3.2	\$512.00	Revise opposition to motion to dismiss/motion to amend
10/31/2014	6	\$160.00	1.1	\$176.00	Revise opposition to motion to dismiss/motion to amend and supporting pleadings
11/03/2014	6	\$270.00	2.4	\$648.00	Final motion to amend and supporting pleadings; correspondence with client
11/03/2014	10	\$270.00	0.3	\$81.00	Analyze email from client; respond to same
11/04/2014	10	\$270.00	1.3	\$351.00	Confer with J. Sykes regarding motion to dismiss; analyze/edit same; email P. DeAngeli regarding status of stipulation; email B. Anderson regarding status of stipulation and analyze response to same
11/05/2014	15	\$225.00	2.2	\$495.00	Research regarding foreclosure issues
11/05/2014	18	\$100.00	0.3	\$30.00	Confer with C. Nicholson regarding foreclosure issues
11/06/2014	6	\$270.00	0.3	\$81.00	Client conference call
11/06/2014	15	\$225.00	1.8	\$405.00	Continued research regarding foreclosure
11/07/2014	15	\$225.00	0.3	\$67.50	Strategy conference with C. Tipton
11/07/2014	18	\$100.00	7.1	\$710.00	Research regarding foreclosure issues
11/10/2014	18	\$100.00	3.2	\$320.00	Draft research memorandum; confer with C. Nicholson regarding same
11/11/2014	15	\$225.00	2.1	\$472.50	Revise memorandum
11/12/2014	15	\$225.00	0.7	\$157.50	Finalize memorandum; legal research
11/12/2014	10	\$270.00	1.6	\$432.00	Analyze emails from client; draft changes to Reeves affidavit; email affidavit to client; analyze motion for extension of time filed by VP, Inc.; draft objection to VP's request for an extension
11/13/2014	10	\$270.00	0.9	\$243.00	Analyze pleading filed by VP requesting telephonic appearance; telephone conference with P. Ware regarding current counsel for MFO8 and documents related to same; telephone conference with S. Uecker regarding stipulation to substitute as the real party in interest; leave voicemail for T. McLaughlin regarding same; analyze court's order granting VP's request for an extension
11/17/2014	6	\$270.00	1.1	\$297.00	Study pleadings related to motion to amend
11/17/2014	10	\$270.00	1.3	\$351.00	Analyze pleadings filed by VP in opposition to motion to amend; email same to client; analyze emails from B. Kramer and W. Haberman; telephone conference with same; analyze response to opposition filed by VP; confer with J. Sykes; same; analyze voluntary dismissal of MFO8
11/18/2014	6	\$270.00	4.6	\$1,242.00	Review and revise proposed complaint and third party complaint; confer with R. Stacey; prepare proposed orders to grant Valiant's motion to amend, grant Valiant's motion to serve 3rd party complaint, and denial of VP's motion to dismiss
11/19/2014	6	\$270.00	12.8	\$3,456.00	Prepare for, travel to and from hearing, and appear in Court on motions to amend and to substitute real party in interest, and for scheduling conference; file complaint; meet with opposing counsel regarding stipulations to priority and litigation scheduling
11/19/2014	10	\$270.00	1.7	\$459.00	Confer with J. Sykes; analyze litigation guarantee;

					telephone conference with B. Kramer; analyze email from W. Haberman; confer with paralegal regarding service of all third party defendants
12/01/2014	10	\$270.00	1.1	\$297.00	Draft motions to take default
12/04/2014	10	\$270.00	1.9	\$513.00	Confer with J. Sykes; analyze/draft/edit default judgments and associated pleadings
12/08/2014	10	\$270.00	0.2	\$54.00	Draft/analyze/edit 3 day notice of intent to take default of VP
12/12/2014	10	\$270.00	2.7	\$729.00	Analyze VP answer; email clients regarding the same; analyze client emails; draft email to counsel for VP regarding basis for priority; forward the same to clients; analyze email from clients; confer with J. Sykes; analyze project documents; draft outlines
08/06/2015	10	\$270.00	3.4	\$918.00	Analyze email from R. Meyers; draft response to the same; confer with C. Nicholson and C. Tipton; analyze objection filed by VP and affidavit of Vilelli in support of the same
08/07/2015	10	\$270.00	1.7	\$459.00	Telephone conference with R. Myers regarding status of case and conference call with R. Myers and H. Brooks regarding the same; analyze email from B. Haberman; analyze objection filed by VP and affidavit of Vilelli in support of the same; leave voicemail for Bonner County Sheriff
10/06/2015	10	\$250.00	1.4	\$350.00	Analyze/draft/edit interrogatories to VP
10/06/2015	10	\$250.00	2.8	\$700.00	Review/analyze project documents and pleadings for discovery issues related to VP
10/07/2015	10	\$250.00	1.9	\$475.00	Analyze/draft/finalize interrogatories to VP
11/19/2015	10	\$250.00	3.5	\$875.00	Analyze discovery responses from VP and NIR
11/23/2015	10	\$250.00	3.4	\$850.00	Outline responses to VP's discovery requests and draft/analyze emails to client requesting documents and responses to the same
11/25/2015	10	\$250.00	2.4	\$600.00	Analyze/draft/edit responses to VP requests for production and interrogatories
11/30/2015	10	\$250.00	8.7	\$2,175.00	Analyze/draft/finalize answers to VP rogs, rfas, and rfs; analyze documents from client; meet with S. Sawyer
12/01/2015	15	\$195.00	0.4	\$78.00	Draft meet and confer to Susan Weeks regarding expert disclosure of Annette Brule
12/07/2015	15	\$195.00	1	\$195.00	Analysis of VP's supplemental expert witness disclosure
12/14/2015	10	\$270.00	2.1	\$567.00	Analyze documents produced by NIR and VP in discovery
12/17/2015	10	\$250.00	2.9	\$725.00	Telephone conference with B. Haberman and B. Kramer; analyze NIR and VP documents
12/23/2015	10	\$250.00	2.6	\$650.00	Analyze Valiant/RE Loans/Pensco/MF08 documents; analyze NIR/VP's oppositions to Valiant's motions in limine; outline replies to the same; emails to and from D. Marfice regarding deposition locations
12/27/2015	15	\$195.00	6.1	\$1,189.50	Research regarding reply in support of motion in Limine regarding NIR/VP (3.2); begin drafting reply in support of motion in Limine regarding NIR/VP (2.9)
01/15/2016	10	\$250.00	5.9	\$1,475.00	Analyze VP witness list; analyze VP exhibit list; search Concordance database; telephone conference with J. Sykes; coordinate discussion with C. Reeves; telephone conference with client; telephone conference with D. Penny; prepare for trial
01/19/2016	10	\$250.00	7.9	\$1,975.00	Analyze/edit trial brief; analyze trial exhibits from VP; analyze research regarding admissibility of court documents
01/19/2016	6	\$250.00	3.4	\$850.00	Conference with S. Weeks regarding trial exhibits; multiple telephone conferences with Greenspan/Adjuster's International; telephone conference with Chuck Reeves; revise trial brief
03/31/2016	10	\$250.00	4.8	\$1,200.00	Analyze exhibits and exhibit lists; analyze email from client; draft/analyze email to S. Weeks withdrawing settlement offer; analyze/draft letter to S. Weeks explaining the same; review boxes, folders, notes, etc. to verify everything shipped properly; confer with J. Sykes
05/12/2016	10	\$250.00	0.8	\$200.00	Analyze email from S. Weeks requesting extension; confer with client regarding the same; respond to S. Weeks advising that client will not agree to analyze extension; analyze/draft/email to S. Shafer; analyze response to the same
05/16/2016	10	\$250.00	6.4	\$1,600.00	Draft letter to counsel for VP requesting immediate production of closing argument; analyze emails from client; telephone conference with client; analyze closing argument filed by VP, Inc.; outline rebuttal; confer with J. Sykes
<b>Subtotal of Fees</b>			<b>171.00</b>	<b>\$39,594.50</b>	

**Subsection B-2**

**VALIANT FORECLOSURE**

Fees Allocated Jointly to JV and VP

Trans Date	Atty	Rate	Hours to Bill	Amount	
11/11/2015	10	\$250.00	1.3	\$325.00	Analyze FATCO documents
11/11/2015	10	\$270.00	0.2	\$54.00	Analyze letter from FATCO
11/12/2015	10	\$250.00	4.8	\$1,200.00	Analyze FATCO and documents; analyze emails from B. Ng.
11/12/2015	10	\$250.00	0.3	\$75.00	Telephone conference with client
11/13/2015	10	\$250.00	3.1	\$775.00	Continue to analyze FATCO documents
11/13/2015	10	\$250.00	0.4	\$100.00	Analyze email from client
11/13/2015	10	\$270.00	0.6	\$162.00	Analyze emails from FATCO and Dean Shafer; telephone conference with D. Shafer

11/16/2015	10	\$270.00	0.3	\$81.00	Analyze emails from D. Shafer and respond to the same
11/16/2015	15	\$195.00	0.6	\$117.00	Review of JV Discovery responses to logs 13-23 and RFPs 7-20 (0.1); review of NIR Answers to logs 13-23 and RFPs 7-20 (0.1)
11/16/2015	10	\$250.00	1.6	\$400.00	Analyze Sandpoint Title documents; analyze emails from C. Reeves
11/16/2015	10	\$250.00	0.2	\$50.00	Email C. Reeves regarding deposition
11/16/2015	10	\$250.00	5.2	\$1,300.00	Analyze discovery responses from VP and JV, LLC; analyze documents from C. Reeves; confer with title company; analyze document from title company
11/17/2015	10	\$250.00	5.9	\$1,475.00	Analyze Sandpoint Title and C. Reeves documents
11/18/2015	10	\$250.00	4.1	\$1,025.00	Analyze C. Reeves documents
11/18/2015	8	\$250.00	0.5	\$125.00	Continue evaluation of possible mediation options
11/18/2015	10	\$270.00	2.3	\$621.00	Analyze complaint filed against interests of RE Loans, MFD8 and Pensco Trust; draft email to First American; draft email to Fidelity; analyze emails from D. Shafer and M. Hathaway
11/19/2015	10	\$270.00	0.9	\$243.00	Analyze multiple emails from D. Shafer; telephone conference with D. Shafer regarding the same; analyze emails from FATCO regarding the same; analyze exhibit from D. Shafer
11/20/2015	10	\$250.00	2.6	\$650.00	Analyze agreements between Valiant and POBD/Raeves
11/20/2015	10	\$250.00	0.7	\$175.00	Draft/analyze/edit letter to Reeves
11/23/2015	6	\$250.00	1.7	\$425.00	Correspondence with D. Kreifels
11/24/2015	10	\$250.00	3.6	\$900.00	Compile documents to produce to opposing counsel
11/25/2015	10	\$250.00	1.5	\$375.00	Telephone conference with G. Finney and S. Weeks regarding depositions and mediation
11/25/2015	10	\$270.00	0.3	\$81.00	Draft/analyze/edit email First American regarding mediation
11/30/2015	6	\$250.00	0.9	\$225.00	Review/analyze trial witness disclosures and discovery responses
12/01/2015	10	\$250.00	4.1	\$1,025.00	Continue to analyze documents for confidential and privileged information; analyze email from D. Kreifels; telephone conference with D. Kreifels; coordinate document production with S. Sawyer
12/01/2015	6	\$250.00	2.1	\$525.00	Correspondence with D. Kreifels
12/02/2015	10	\$250.00	3.4	\$850.00	Draft/analyze/edit email to opposing counsel regarding discovery responses; draft/analyze and edit emails to C. Reeves and B. Ng regarding depositions; draft/analyze/edit email to D. Marice regarding First American deposition; draft/analyze/edit protective order; email the same to opposing counsel
12/14/2015	6	\$250.00	0.7	\$175.00	Correspondence with D. Kreifels
12/04/2015	10	\$250.00	5.4	\$1,350.00	Analyze documents from client; analyze Fidelity correspondence; respond to the same; email S. Weeks and G. Finney regarding confidentiality agreement
12/04/2015	10	\$250.00	1.9	\$475.00	Email S. Weeks and G. Finney regarding deposition of C. Reeves; draft/analyze/edit deposition notice for C. Reeves; email C. Reeves regarding deposition; coordinate location of deposition with Reno law firm; email B. Ng regarding deposition
12/07/2015	10	\$270.00	1.6	\$432.00	Prepare for and participate in conference call with client; analyze client documents for production
12/07/2015	6	\$270.00	0.8	\$216.00	Telephone conference with clients
12/07/2015	10	\$250.00	0.3	\$200.00	Analyze email from client; email opposing counsel canceling deposition of C. Reeves; analyze email from G. Finney regarding confidentiality agreement; analyze supplemental expert witness disclosure; telephone conference with S. Sawyer regarding documents; email S. Sawyer; analyze email from M. Hathaway and respond to same
12/08/2015	10	\$250.00	2.6	\$650.00	Analyze email from M. Hathaway; telephone conference with M. Hathaway; analyze client documents; telephone conference with S. Sawyer
12/09/2015	10	\$250.00	4.1	\$1,025.00	Draft/analyze letter to opposing counsel regarding confidentiality agreement and Valiant documents (0.6); analyze/identify consulting agreement and consent to judgement (1.1); analyze email from client (0.3); analyze client documents (2.1)
12/09/2015	6	\$250.00	2.9	\$725.00	Correspondence and tel con with D. Penny; provide requested docs
12/10/2015	10	\$250.00	0.3	\$75.00	Analyze email from B. Haberman and email B. Haberman regarding the same
12/11/2015	10	\$250.00	3.3	\$825.00	Telephone conference with B. Haberman; analyze client documents
12/11/2015	6	\$250.00	0.3	\$75.00	Telephone conference with W. Haberman
12/13/2015	10	\$250.00	3.9	\$975.00	Analyze client emails/attachments
12/14/2015	10	\$250.00	2.9	\$725.00	Analyze client emails and coordinate production of non-confidential information; email B. Ng and C. Reeves requesting deposition availability; analyze email from Fidelity; analyze Sage Holdings' claims
12/14/2015	15	\$195.00	7.6	\$1,482.00	Research regarding and draft Motions in Limine
12/15/2015	15	\$195.00	5	\$975.00	Revisions to Motions in Limine regarding VP and NIR; draft Nicholson Declaration in Support of Motions in Limine (1.4); draft Memorandum Support of Motion in Limine regarding JV (2.2); draft motion in Limine regarding NIR & VP (0.3); draft Motion in Limine regarding JV (0.2); draft Declaration of RLS
12/16/2015	10	\$250.00	5.2	\$1,300.00	Analyze First American documents
12/18/2015	10	\$250.00	3.1	\$775.00	Prepare for and attend pretrial conference telephonically; telephone conference with B. Haberman; confer with J. Sykes
12/18/2015	6	\$250.00	1.8	\$450.00	Correspondence and telephone conference with D. Penny; provide additional documents requested by D. Penny
12/21/2015	10	\$250.00	5.6	\$1,400.00	Calculate estimated attorney fees through trial and email the same to attorney for First American Title; confer with C. Nicholson regarding trial deadlines for briefing; compile FATCO documents; email the same to Streamline Imaging; email D. Marice regarding FATCO deposition; analyze filing deadlines for replies to oppositions to motions in Limine and rules regarding the same; analyze/identify and compile trial exhibits; edit litigation outlines

12/22/2015	10	\$250.00	5.2	\$1,300.00	Analyze letter from First American; analyze/edit/draft email to clients; analyze client response; analyze C. Reeves documents; draft deposition notices for R. Lynskey and C. Linscott
12/29/2015	10	\$250.00	3.3	\$825.00	Confer with C. Nicholson regarding hearing; analyze email from client; respond to same; telephone conference with clients; emails to opposing counsel regarding availability of expert for deposition
12/28/2015	15	\$195.00	4.6	\$897.00	Finish drafting response in support of motion in Limine regarding VP/NIR (3.4); draft response in support of motion in Limine regarding JV (1.2)
12/28/2015	8	\$250.00	1.1	\$275.00	Review and revise motion in limine reply memoranda
12/29/2015	10	\$250.00	2.8	\$700.00	E-mail C. Reeves and B. Ng regarding depositions of the same; telephone conference with C. Reeves and B. Ng regarding the same; email First American regarding depositions of C. Linscott and R. Lynskey; analyze response to the same; draft deposition notices for C. Reeves and B. Ng; analyze/edit casemap outlines
12/29/2015	15	\$195.00	1.1	\$2,145.00	Preparation for (1.5), travel to/from (8.4, and attend (1.3) motion in Limine hearing
12/30/2015	10	\$250.00	6.7	\$1,675.00	Confer with J. Sykes regarding deposition availability; telephone conference with C. Reeves and B. Ng; edit deposition notices pursuant to the same; email S. Weeks and G. Finney regarding proposed deposition dates; analyze calendar and email S. Weeks availability for depositions through dates; emails to and from Streamline imaging regarding document blowups and production of documents to opposing counsel; analyze FATCO documents and identify documents that need to be blown up for use at depositions and trial
12/30/2015	6	\$250.00	2.2	\$550.00	Review correspondence from D. Penny; begin trial preparation; research evidence issue; confer with R. Stacey regarding trial preparation
12/31/2015	10	\$250.00	5.2	\$1,300.00	Continue to identify FATCO documents that need to be blown up for trial; analyze/identify trial exhibits; draft/edit/analyze casemap outlines in preparation for trial; analyze court order regarding motions in limine; confer with C. Nicholson regarding the same
01/04/2016	6	\$250.00	0.6	\$150.00	Begin preparation for deposition of C. Reeves
01/04/2016	10	\$250.00	9.7	\$2,425.00	Analyze/draft/edit exhibit list and compile and analyze trial exhibits
01/05/2016	6	\$250.00	1.1	\$275.00	Review and revise trial exhibit list
01/05/2016	10	\$250.00	3.7	\$925.00	Analyze/identify/compile deposition exhibits; analyze/edit trial exhibit list
01/06/2016	6	\$250.00	1.2	\$300.00	Continue preparation for deposition of C. Reeves
01/06/2016	10	\$250.00	6.3	\$1,575.00	Outline questions and otherwise prepare for depositions of C. Linscott and R. Lynskey; telephone conference with clients
01/07/2016	6	\$250.00	0.4	\$100.00	Correspondence regarding property vesting deeds
01/07/2016	6	\$250.00	0.9	\$225.00	Multiple correspondence with C. Reeves
01/07/2016	6	\$250.00	1.9	\$475.00	Continue preparation for C. Reeves deposition
01/07/2016	6	\$250.00	0.9	\$225.00	Review amended notices of deposition of Reeves and Ng
01/07/2016	10	\$250.00	10.7	\$2,675.00	Travel to Sandpoint, Idaho (4.1); attend and participate in depositions of C. Linscott and R. Lynskey (5.3); travel to Spokane, WA. (1.3)
01/08/2016	6	\$250.00	4.2	\$1,050.00	Confer with R. Stacey regarding information needed from Ng and Reeves; prepare trial exhibits; prepare outline for Reeves deposition and trial testimony; telephone conference with C. Reeves regarding deposition
01/08/2016	10	\$250.00	10.9	\$2,725.00	Travel from Boise to Spokane; telephone conference with B. Ng; telephone conf with clients; multiple telephone conference with S. Weeks coordinating the rescheduling of depositions of C. Reeves and A. Brule; telephone conference with S. Weeks regarding same; analyze Ng depo topics; analyze and edit trial exhibit list and trial exhibits
01/09/2016	10	\$250.00	2.1	\$525.00	Research/analyze wrap mortgages
01/10/2016	10	\$250.00	5.7	\$1,425.00	Analyze exhibits and exhibit lists; analyze/identify all recorded documents to obtain certified copies; analyze exhibits and prepare for deposition of B. Ng
01/11/2016	6	\$250.00	6.2	\$1,550.00	Multiple telephone conferences with C. Reeves; telephone conference with S. Weeks regarding depositions; correspondence to counsel regarding deposition changes; study Valiant documents for Reeves deposition; prepare for Brule deposition; examine deeds from Pend Oreille Bonner Development Holdings, Inc. to Pend Oreille Bonner Development for trial exhibits
01/11/2016	15	\$195.00	3.2	\$624.00	Begin drafting pre-trial memorandum; research holding in due course status
01/11/2016	10	\$250.00	11.7	\$2,925.00	Analyze supplemental expert disclosure; outline deposition questions; analyze documents and otherwise prepare for the deposition of B. Ng; edit/analyze exhibit list; travel to Oakland, CA. for deposition
01/11/2016	18	\$100.00	0.3	\$30.00	Pull Law Review Articles
01/12/2016	15	\$195.00	1.5	\$292.50	Discuss deposition A. Brule;
01/12/2016	10	\$250.00	11.6	\$2,900.00	Attend and participate in deposition of B. Ng; travel from Oakland, CA to Boise, Idaho; telephone conference with B. Haberman
01/12/2016	18	\$100.00	0.5	\$50.00	Pull Law Review Articles
01/12/2016	18	\$100.00	1.4	\$140.00	Research admission of certified docs; articles of org; and self-authentication; email regarding research
01/12/2016	6	\$250.00		\$0.00	Continue preparing for A. Brule and C. Reeves depositions; travel to CDA Idaho
01/13/2016	10	\$250.00	4.8	\$1,200.00	Telephone conference with B. Haberman and B. Kramer; confer with J. Sykes; analyze depo exhibits for C. Reeves; compile additional exhibits for C. Reeves deposition; outline questions for A. Brule deposition and confer with J. Sykes regarding the same
01/13/2016	18	\$100.00	1.3	\$130.00	Research admission of certified documents; articles of origin;



01/13/2016	8	\$250.00		\$0.00	self-authentication email regarding research
01/14/2016	10	\$250.00	4.8	\$1,200.00	Continue prep for Brule deposition; continue prep; travel to Spokane; telephone conference with clients
01/14/2016	18	\$100.00		\$350.00	Telephone conference with D. Penny; draft/analyze letter to D. Penny and First American; draft/analyze trial subpoenas and letters to C. Linscott and R. Lynskey; draft/analyze letter to D. Marice regarding the same; analyze/adv/finalize exhibit list; analyze trial exhibits for production; analyze/draft/edit witness list
01/14/2016	6	\$250.00	9.9	\$2,450.00	Research certification of business records
01/15/2016	6	\$250.00	11	\$2,750.00	Attend deposition of Annette (Tony) Brule; prepare for Chuck Reeves for deposition; telephone conference with client
01/16/2016	6	\$250.00	4	\$1,000.00	Attend deposition of Chuck Reeves; travel to Spokane, WA; study deposition exhibits; telephone conference with R. Stacey
01/16/2016	6	\$250.00	1	\$250.00	Return to Boise
01/19/2016	15	\$195.00	2.8	\$546.00	Correspondence to obtain documents re insurance
01/19/2016	18	\$100.00	2.9	\$290.00	Continue drafting pre-trial brief and research regarding pre-trial brief
01/20/2016	10	\$250.00	3.1	\$775.00	E-mail regarding certification of Wells Fargo Records; Bonner county records; research regarding burden of proof/burden of evidence; telephone conference with Wells Fargo rep
01/20/2016	18	\$100.00	3.5	\$350.00	Analyze/finalize trial brief; analyze research; research hearsay exceptions
01/20/2016	6	\$250.00	7.2	\$1,300.00	Telephone conference with Wells Fargo; research regarding legally operative fact exception
01/21/2016	10	\$250.00	7.9	\$1,975.00	Letter to D. Penny; telephone conference with Chuck Reeves; review document from C. Reeves; update trial exhibits; revise trial brief; review JV Exhibit List and VP Exhibit List; telephone conference with Greenspan/Adjuster's International
01/21/2016	18	\$100.00	2.9	\$290.00	Meeting with J. Sykes; analyze documents and amend exhibit lists; analyze rules of evidence; analyze VP documents; telephone conference with D. Kreitzman; confer w C. Tipton; email H. Spector; analyze response
01/21/2016	6	\$250.00	5.3	\$1,325.00	research untruthful acts subject to extrinsic evidence
01/22/2016	10	\$250.00	6.6	\$1,650.00	Research legally operative fact; research IRE 803(15); email/phone call regarding affidavit
01/22/2016	6	\$250.00	8.3	\$1,575.00	Review and revise documents; create new trial exhibits; revise trial brief
01/24/2016	10	\$250.00	6.7	\$1,675.00	Analyze deposition transcripts; compile documents/exhibit binders to ship to Sandpoint; identify equipment to ship to Sandpoint; confer with IT company regarding the same; analyze email from H. Spector; confer with C. Tipton; analyze deposition exhibits
01/24/2016	18	\$100.00	0.4	\$40.00	Continue preparing for trial; study trial exhibits; telephone conference with Chuck Reeves; conference with Adjuster's International; begin review of Brule and Reeves deposition transcripts
01/24/2016	6	\$250.00	3.9	\$975.00	Prepare for trial
01/25/2016	15	\$195.00	0.7	\$136.50	E-mail regarding cross complaint; follow-up records affidavit
01/25/2016	10	\$250.00	3.9	\$2,450.00	Trial preparation; prepare new exhibit 55; telephone conference with Chuck Reeves; prepare direct exam of Chuck Reeves
01/25/2016	6	\$250.00	4.2	\$1,050.00	Draft memoranda of law
01/26/2016	10	\$250.00	13.1	\$3,275.00	Prepare for trial
01/26/2016	6	\$250.00	14	\$3,500.00	Continue trial preparation; review Deeds of Trust; finalize Exhibit 65A; conference with P. DeAngeli
01/27/2016	15	\$195.00		\$0.00	Travel from Boise to Sandpoint; telephone conference with client; analyze exhibits and direct testimony; trial preparation
01/27/2016	10	\$250.00	14.3	\$3,575.00	Travel to Sandpoint, Idaho; trial preparation
01/27/2016	6	\$250.00	10.5	\$2,325.00	Deal with original exhibit issues (1,4); review VP's Motion to Amend
01/28/2016	15	\$195.00	3.4	\$663.00	Meeting with B. Ng; meeting with C. Linscott; meet with client; otherwise prepare for trial
01/28/2016	10	\$250.00	14.7	\$3,575.00	Trial preparation; prepare trial examination; telephone call to witness identified by JV and VP; meet Bill Haberman
01/28/2016	6	\$250.00	12.5	\$3,125.00	Research and revise memoranda regarding depositions and res judicata effect; review loan documents
01/29/2016	15	\$195.00	1.5	\$292.50	Attend trial; argue opposition to motion to amend; prepare for opening statements; meet with witness; meet with witness; trial preparation
01/29/2016	10	\$250.00	9.8	\$2,450.00	Trial preparation for second day of trial
01/29/2016	6	\$250.00	11	\$2,750.00	Review documents; review Finney offer to purchase; telephone conference with and email to Phil DeAngeli
01/30/2016	10	\$250.00	3.9	\$975.00	Prepare for trial; attend trial; redirect examination of B. Ng; direct examination of C. Linscott; redirect examination of C. Linscott
01/30/2016	6	\$250.00	7	\$1,750.00	Second day of trial
02/01/2016	10	\$250.00	4.1	\$1,025.00	Box exhibits, documents, binders, etc and mail to Boise, ID; travel from Sandpoint to Boise, ID
02/01/2016	6	\$250.00	0.2	\$50.00	Meet with Bill Haberman; travel to Boise
02/04/2016	10	\$250.00	3.1	\$775.00	Analyze status of trial; telephone conference with D. Penny
02/05/2016	10	\$250.00	2.1	\$525.00	Telephone conference with D. Penny
02/05/2016	6	\$250.00	0.5	\$125.00	Analyze boxes from Sandpoint and verify everything was received from UPS
02/08/2016	10	\$250.00	2.1	\$525.00	Analyze email from client and respond to the same; analyze trial notice; outline issues for on redirect
					Correspondence with D. Penny; correspondence with court reporter and counsel regarding transcript
					Analyze pleadings for potential default issues; analyze email from client;

						draft/analyze response to same; confer with J. Sykes
02/08/2016	6	\$250.00	0.8	\$200.00		Correspondence regarding chain of title
02/16/2016	10	\$250.00	6.1	\$1,525.00		Analyze email from client;
						analyze email and letters from First American; analyze/draft email to P. DeAngeli; analyze response to same;
						analyze email from court reporter; analyze client documents; analyze Reeves documents
02/18/2016	10	\$250.00		\$0.00		Analyze email from P. DeAngeli
02/21/2016	10	\$250.00	3.8	\$950.00		Prepare for conference calls with B. Haberman and C. Reeves; telephone conference with B. Haberman;
						telephone conference with C. Reeves;
						analyze Eagle Point documents; telephone conference with client; confer with J. Sykes
02/23/2016	10	\$250.00	5.1	\$1,275.00		Analyze exhibits
02/29/2016	6	\$250.00	4.4	\$1,100.00		Study Eagle Pointe deeds
03/01/2016	6	\$250.00	4.2	\$1,050.00		Prepare trial testimony; correspondence with C. Reeves; correspondence to P. DeAngeli; review Eagle Pointe documents
03/01/2016	10	\$250.00	3.1	\$775.00		Analyze emails from client and respond to the same; analyze documents; analyze Eagle Pointe issues;
						analyze FATCC documents; analyze trial issues
03/03/2016	6	\$250.00	2.2	\$550.00		Telephone conference with client; continue preparation of trial testimony
03/04/2016	6	\$250.00	2.1	\$525.00		Prepare additional documents for review
03/07/2016	6	\$250.00	0.3	\$75.00		Review correspondence from client
03/07/2016	10	\$250.00	5.2	\$1,300.00		Prepare for trial
03/08/2016	10	\$250.00	2.9	\$725.00		Prepare for trial
03/09/2016	18	\$100.00	1.6	\$160.00		Research paying down of lien
03/09/2016	10	\$250.00	4.9	\$1,225.00		Prepare for trial
03/10/2016	18	\$100.00	2.1	\$210.00		Research pay down of lien
03/10/2016	10	\$250.00	5.7	\$1,425.00		Prepare for trial
03/11/2016	10	\$250.00	5.1	\$1,275.00		Prepare for trial
03/12/2016	6	\$250.00	2.1	\$525.00		Prepare for and attend telephone conference with C. Reeves
03/12/2016	10	\$250.00	4.3	\$1,075.00		Prepare for trial
03/13/2016	10	\$250.00	4.7	\$1,175.00		Prepare for trial
03/14/2016	6	\$250.00	1	\$250.00		Prepare materials for trial
03/14/2016	18	\$100.00	2.1	\$210.00		Research release of lots
03/14/2016	10	\$250.00	6.7	\$1,675.00		Prepare for trial
03/15/2016	8	\$250.00	12	\$3,000.00		Travel to Sandpoint and prepare for trial; interview C. Reeves
03/15/2016	10	\$250.00	14.1	\$3,525.00		Travel to Sandpoint, ID from Boise, ID; meet with B. Haberman; meet with C. Reeves; prepare for trial
03/16/2016	6	\$250.00	12	\$3,000.00		Attend trial; prepare for next day of trial
03/16/2016	10	\$250.00	13.4	\$3,350.00		Prepare for trial; attend trial; prepare for trial on following day
03/17/2016	6	\$250.00	11	\$2,750.00		Attend last day of trial; meet with client and witnesses
03/17/2016	18	\$100.00	0.8	\$80.00		Review Discovery to identify rebuttal exhibit
03/17/2016	10	\$250.00	11.1	\$2,775.00		Prepare for trial; attend trial; meeting with client
03/17/2016	15	\$195.00	0.7	\$136.50		Review loan documents
03/18/2016	6	\$250.00	6.5	\$1,625.00		Return to Boise from Sandpoint
03/18/2016	10	\$250.00	4.3	\$1,075.00		Travel to Boise, Idaho from Sandpoint, Idaho
03/21/2016	10	\$250.00	3.2	\$800.00		Analyze/outline trial testimony; confer with J. Sykes
03/28/2016	6	\$250.00	0.1	\$25.00		Telephone conference with D. Penny
03/30/2016	6	\$250.00	0.2	\$50.00		Correspondence with D. Penny
04/01/2016	10	\$250.00	1.6	\$400.00		Analyze/draft rough outline for closing argument
04/04/2016	10	\$250.00	6.4	\$1,600.00		Begin analysis of admitted exhibits for closing arguments; begin legal research in support of closing argument; begin outlining closing argument
04/05/2016	10	\$250.00	1.4	\$350.00		Continue analysis exhibits
04/11/2016	10	\$250.00	6.5	\$1,625.00		Analyze/edit/finalize written closing argument
04/12/2016	10	\$250.00	7.1	\$1,775.00		Draft/analyze/edit written closing argument; analyze admitted exhibits
04/13/2016	10	\$250.00	5.8	\$1,700.00		Draft/analyze/edit written closing argument; analyze admitted exhibits; research legal issues;
						analyze/draft/finalize affidavit of B. Haberman; analyze spreadsheets; analyze/draft email to client; analyze amended spreadsheets
04/13/2016	15	\$195.00	0.8	\$175.50		Review discovery responses in support of closing argument
04/13/2016	18	\$100.00	0.3	\$30.00		Research regarding Bonner County Local Rules
04/14/2016	10	\$250.00	6.1	\$1,525.00		E-mail draft closing argument to client; analyze emails from client; draft/analyze/finalize written closing argument;
						analyze/finalize affidavit of B. Haberman
04/21/2016	10	\$250.00	2.4	\$600.00		Several emails to D. Shafer; analyze responses to same
04/22/2016	10	\$250.00	4.3	\$1,075.00		Analyze spreadsheet identifying lots;
						verify all lots described in Exhibit 30; email Bonner County tax assessor; analyze emails from D. Shafer
04/25/2016	10	\$250.00	3.1	\$775.00		Analyze information from D. Shafer;
						analyze trial exhibits; telephone conference with C. Plehi;
						email to C. Plehi; analyze response to same;
						analyze lit guarantee; analyze/draft email to C. Plehi;
						analyze notice from Supreme Ct. re: dates for Trestle Creek hearing; email same to clients
04/26/2016	10	\$250.00	1.9	\$475.00		Analyze email and attachments from C. Plehi; email D. Shafer; analyze email from D. Shafer; email D. Shafer; analyze email from B. Haberman
04/27/2016	10	\$250.00	2.9	\$725.00		Analyze emails from B. Haberman; respond to same;
						analyze motion to strike filed by VP, inc.;
						analyze/draft email to client; outline response to VP and JV motions to strike; begin draft/analyze response to the same;
						analyze and respond to multiple emails from client
04/28/2016	10	\$250.00	0.8	\$200.00		Analyze email from D. Shafer;
						telephone conference with D. Shafer;
						analyze email from the court; email to client

04/29/2016	10	\$250.00	0.4	\$100.00	Analyze order from Court denying motions to strike Haberman affidavit and attachment; analyze email from client
05/02/2016	10	\$250.00	4.4	\$1,100.00	Prepare for drafting final judgment by analyzing properties subject to RE Loans, Pensco and MF08 mortgages; identify properties subject only to RE and the Redemption Deed, properties only subject to Pensco and the Redemption Deed; properties only subject to Pensco and MF08 and the Redemption Deed; analyze properties only subject to MF08 and the redemption deed
05/03/2016	10	\$250.00	3.3	\$825.00	Outline properties subject to the RE Loans, Pensco, MF08 mortgages and the Redemption Deed; draft/analyze email to D. Shafer
05/04/2016	10	\$250.00	1.3	\$475.00	Research issues for final judgment
05/05/2016	10	\$250.00	1.1	\$275.00	Analyze/draft/edit email to C. Pientl; analyze email from D. Shafer
05/09/2016	10	\$250.00	1.9	\$475.00	Analyze email from D. Shafer; analyze parcel spreadsheet and lot releases/partial lot releases; email D. Shafer
05/10/2016	10	\$250.00	3.7	\$925.00	Analyze email from D. Shafer; analyze/draft email to D. Shafer; analyze emails from D. Shafer and M. Hathaway
05/11/2016	10	\$250.00	0.6	\$150.00	Analyze email from client; telephone conference with client
05/12/2016	6	\$250.00	0.7	\$175.00	Review correspondence from W. Haberman
05/13/2016	6	\$250.00	3.3	\$825.00	Review closing arguments of JV and VP; research issues; correspondence from B. Kramer
05/26/2016	6	\$250.00	1.2	\$300.00	Correspondence to clients
05/26/2016	10	\$250.00	6.2	\$1,550.00	Analyze/edit/finalize rebuttal arguments; analyze emails from clients
05/27/2016	6	\$250.00	2.2	\$550.00	Review Court's Memorandum Decision; telephone conference with clients
05/27/2016	10	\$250.00	2.8	\$700.00	Analyze memorandum decision and order from Bonner County Court; confer with J. Sykes; telephone conference with clients; email D. Penny; analyze response
05/31/2016	6	\$250.00	0.6	\$125.00	Telephone conference with clients
05/31/2016	10	\$250.00	4.4	\$1,100.00	Analyze emails from clients; respond to same; research post-decision motions; draft judgment and order of sale
6/8/2016	10	\$250.00	0.4	\$100.00	Analyze email from client; respond to the same; confer with C. Tipton
6/9/2016	10	\$250.00	9.1	\$2,275.00	Draft/analyze/edit judgment and decree of foreclosure
6/13/2016	10	\$250.00	6.2	\$1,550.00	Finalize proposed judgment and foreclosure decree; outline motion for proposed order of sale; research marshaling doctrines;
6/20/2016	10	\$250.00	7.2	\$1,300.00	Analyze disaster clean-up issues; telephone conference with court clerk; analyze/edit/draft changes to judgment and foreclosure decree; forward the same to clients; continue research; draft/analyze/edit motion for proposed order of sale
6/21/2016	10	\$250.00	6.7	\$1,675.00	Analyze/draft/edit memorandum in support of motion for order of sale
6/22/2016	10	\$250.00	7.3	\$1,950.00	Analyze/edit/finalize memo/motion for proposed order of sale; analyze/draft/finalize proposed order of sale
<b>Subtotal of Fees</b>			<b>794.90</b>	<b>\$192,567.50</b>	
<b>VP's Pro Rata Share</b>	<b>50%</b>		<b>397.45</b>	<b>\$96,278.75</b>	

**Subsection D-3  
VALIANT FORECLOSURE**  
Fees Allocated Jointly to NIR and VP

Trans Date	Atty	Rate	Hours to Bill	Amount	
02/09/2015	6	\$250.00	0.2	\$50.00	Telephone conference with S. Weeks regarding summary judgment hearing
02/11/2015	6	\$250.00	0.2	\$50.00	Telephone conference with S. Weeks
02/23/2015	6	\$250.00	4	\$1,000.00	Prepare reply memorandum to NIR/VP summary judgment opposition
03/05/2015	6	\$250.00	5.2	\$1,300.00	Continue preparation of reply memorandum to North Idaho Resorts and VP's opposition
03/06/2015	6	\$250.00	6.8	\$1,700.00	Continue preparation of summary judgment reply memoranda
03/06/2015	16	\$100.00	1.5	\$150.00	Research Equitable Servitude Requirements and Inquiry Notice
03/07/2015	18	\$100.00	2.2	\$220.00	Research Equitable Servitude Requirements and Inquiry Notice
03/09/2015	6	\$250.00	3.2	\$800.00	Revise summary judgment reply memoranda
03/09/2015	6	\$250.00	0.3	\$75.00	Correspondence with D. Shafer regarding legal description
03/09/2015	6	\$270.00	0.3	\$81.00	Correspondence with D. Shafer regarding expert issues
03/10/2015	6	\$250.00	5.7	\$1,425.00	Revisions to summary judgment reply memoranda
03/10/2015	16	\$100.00	6.1	\$610.00	Draft/Revise/Send Memo on Equitable Servitudes
05/27/2015	10	\$270.00	3.7	\$999.00	Analyze defendants VP's and NIR's second motion for enlargement of time to file memorandum in support of motion for reconsideration; email client; prepare for and participate in conference call with clients and J. Sykes; confer with J. Sykes and C. Tipton regarding legal research
05/27/2015	6	\$270.00	1.2	\$324.00	Telephonic meeting with clients; correspondence with Fidelity
06/16/2015	15	\$195.00	1.4	\$273.00	Review and analysis of JV, LLC's motion to reconsider and court's summary judgment decision
06/17/2015	10	\$250.00	1.3	\$325.00	Analyze motion to reconsider filed by VP and NIR
06/17/2015	10	\$250.00	2.9	\$725.00	Outline strategy and response to VP and NIR motion to reconsider
07/06/2015	10	\$250.00	0.9	\$225.00	Review/analyze motion to reconsider
07/06/2015	10	\$250.00	0.5	\$125.00	Analyze motion for enlargement of time filed by NIR and VP
07/06/2015	10	\$250.00	0.2	\$50.00	Review/analyze email from opposing counsel regarding the same
07/07/2015	10	\$250.00	1.6	\$450.00	Analyze NIR objection
07/07/2015	15	\$225.00	0.6	\$135.00	Review and analysis of NIR/VP's reply in support of its motion for reconsideration and its objection to proposed final judgment (0.4);

07/07/2015	10	\$270.00	2.3	\$621.00	Review and analysis of JV's objection to proposed final judgment (0.2) Analyze emails from D. Shafer; draft/analyze responses to the same; telephone conference with D. Shafer; email client re: the same; email D. Shafer and B. Haberman regarding conference call; email R. Lynksey; analyze response; email D. Stapels
08/04/2015	10	\$270.00	3.4	\$918.00	Analyze motion for proposed order of sale; analyze Valiant memoranda and oppositions filed by NIR; research legal issues, outline oral arguments and prepare for hearing on the same
08/07/2015	15	\$225.00	1.1	\$247.50	Continue research regarding foreclosure sales
08/10/2015	18	\$100.00	2.8	\$280.00	Research credit bidding; confer regarding same
08/10/2015	10	\$270.00	3.1	\$837.00	Telephone conference with B. Haberman; prepare for and participate in conference call with R. Myers and H. Brooks; confer with C. Nicholson and C. Tipton regarding status of legal research
08/10/2015	15	\$225.00	6.4	\$1,440.00	Research regarding subrogation and redemption
08/11/2015	18	\$100.00	2.9	\$290.00	Review redemption research; confer with J. Sykes; research inverse alienation
08/11/2015	10	\$270.00	2.7	\$729.00	Research legal issues regarding priority; confer with J. Sykes regarding the same
08/11/2015	15	\$225.00	1.8	\$405.00	Research redemption and credit bidding
08/11/2015	6	\$270.00	1.2	\$324.00	Research foreclosure issue
08/12/2015	18	\$100.00	4.8	\$480.00	Research regarding order of sale, marshalling, and inverse alienation
08/12/2015	15	\$225.00	2.9	\$652.50	Continued research regarding marshalling of assets
08/13/2015	18	\$100.00	6.2	\$620.00	Research waiver and inverse alienation
08/13/2015	10	\$270.00	6.2	\$1,674.00	Analyze litigation guarantee and mortgages; analyze documents from Dean Shafer; multiple phone conversations with D. Shafer; confer with J. Sykes; confer with C. Nicholson and C. Tipton re legal research; telephone conference with B. Haberman; outline C. Reeves affidavit; analyze email from B. Haberman; draft outline of D. Shafer affidavit; compile documentation for R. Myers and H. Brooks; draft email to same regarding documentation; analyze email from D. Shafer; telephone conference with D. Shafer
08/13/2015	15	\$225.00	5.7	\$1,282.50	Continued research regarding marshalling of assets
08/13/2015	6	\$270.00	1.6	\$432.00	Confer with R. Stacey; conference call with R. Stacey and D. Shafer regarding properties
08/16/2015	15	\$225.00	12.3	\$2,767.50	Additional research & draft memo support motion reconsider order of sale
08/17/2015	18	\$100.00	9.5	\$950.00	Research and Draft Motions and Argument for Inverse Alienation
08/17/2015	10	\$270.00	7.7	\$2,079.00	Draft/analyze/edit motion and memorandum in support of motion to alter foreclosure decree; draft/analyze edit affidavits of C. Reeves and D. Shafer in support of motion to alter foreclosure decree and to reconsider the proposed order of sale; analyze multiple emails from D. Shafer and C. Reeves regarding the same; research legal issues in support of motion to reconsider order of sale and decree of foreclosure
08/17/2015	15	\$225.00	4.3	\$967.50	Revise memo supp reconsider order of sale; additional research regarding marshalling of assets
08/17/2015	6	\$270.00	1.1	\$297.00	Confer with R. Stacey regarding foreclosure procedure; study correspondence from D. Shafer
08/18/2015	18	\$100.00	2.5	\$250.00	Research marshalling of assets
08/18/2015	10	\$270.00	3.1	\$2,187.00	Analyze/edit draft memorandum in support of proposed order of sale; email C. Reeves and D. Shafer draft affidavits; analyze emails from C. Reeves and D. Shafer regarding the same; analyze/edit affidavits to reflect requested changes to the same; email C. Reeves and D. Shafer amended affidavits; telephone conference with Pioneer Title regarding Shafer affidavit; telephone conference with D. Shafer (2) regarding the same; analyze/edit affidavit of D. Shafer based upon the same; analyze motions and briefing in support of the same
08/18/2015	15	\$225.00	9.4	\$2,115.00	Continue draft Memo, Supp Motion Alter, Amend, Reconsider
08/19/2015	10	\$270.00	9.6	\$2,322.00	Analyze/draft/edit motion for proposed order for sale and to alter judgment; multiple telephone conferences with D. Shafer; edit memoranda; draft/analyze/edit declaration of D. Shafer; telephone conference with B. Haberman; analyze exhibits to declarations; analyze legals discussed by D. Shafer; analyze D. Shafer declarations, exhibits and other documents
08/28/2015	15	\$225.00	0.3	\$67.50	Review and Analysis of NIR/VP's response to motion to reconsider order of sale
09/01/2015	10	\$270.00	4.8	\$1,296.00	Analyze Valiant's motions and memoranda and JV and NIR's oppositions to motion alter/reconsider order of sale to the same in preparation for hearing; outline arguments, perform additional legal research and otherwise prepare for hearing in support of motion to alter order of sale; confer with J. Sykes
09/14/2015	8	\$250.00	0.4	\$100.00	Prepare meet and confer correspondence to S. Weeks
09/30/2015	10	\$250.00	1.1	\$275.00	Analyze VP/NIR motions to reconsider
09/30/2015	10	\$250.00	2.8	\$700.00	Analyze/draft/edit opposition to VP/NIR's new motion to reconsider
09/30/2015	10	\$250.00	0.3	\$75.00	Draft letter to S. Weeks regarding whether VP still intends to cancel the motions to reconsider
10/13/2015	10	\$250.00	1.1	\$275.00	Analyze NIR and VP motion for additional time
10/13/2015	10	\$250.00	1.3	\$325.00	Outline objections to the same
10/13/2015	10	\$250.00	0.2	\$50.00	Email the same to client
10/13/2015	10	\$250.00	0.4	\$100.00	Telephone conference with client regarding the same
10/14/2015	10	\$250.00	1.5	\$375.00	Analyze VP and NIR's opposition to motion for summary judgment and supporting affidavits
10/15/2015	15	\$195.00	2.1	\$409.50	Opp to NIR/VP's Rule 58(f) & Motion Extend Time under Rule 5(e)(1)

10/15/2015	15	\$195.00	2.9	\$565.50	Research regarding 56(f) requirements
10/16/2015	15	\$195.00	0.2	\$39.00	Analysis of NIR/VP opp 3rd SJ Motion
10/18/2015	15	\$195.00	0.5	\$97.50	Analysis of NIR/VP opp to Valiant's 3rd SJ
10/18/2015	15	\$195.00	2.6	\$507.00	Begin draft Reply to NIR/JV Opp to 3rd SJ Motion
10/19/2015	15	\$195.00	5.6	\$1,092.00	Begin drafting Reply in Respond to NIR/VP's Opp to Third SJ Motion
10/19/2015	10	\$250.00	0.2	\$50.00	Email S. Weeks regarding deposition of NIR and VP
10/20/2015	15	\$195.00	0.4	\$79.00	Research Re: 56(f) standards
10/21/2015	15	\$195.00	1.9	\$370.50	Reply to NIR-VP's Opp to Valiant's First Motion to Strike
10/21/2015	10	\$250.00	3.3	\$825.00	Analyze/draft/edit motions to strike and memoranda in support of the same
10/21/2015	10	\$250.00	0.5	\$125.00	Draft/analyze/fnalize motions to strike and memoranda affidavite in support of the same
10/27/2015	10	\$250.00	0.2	\$50.00	Analyze email from S. Weeks regarding deposition dates for NIR and VP
10/28/2015	10	\$250.00	1.1	\$275.00	Analyze discovery requests from NIR and VP
10/28/2015	10	\$250.00	0.2	\$50.00	Email the same to client
11/02/2015	10	\$250.00	0.5	\$125.00	Analyze email from S. Weeks and voicemail from the same regarding deposition dates and analyze/draft response to the same
11/05/2015	10	\$250.00	0.5	\$125.00	telephone conference with S. weeks regarding deposition availability and analyze email from S. Weekes regarding the same
<b>Subtotal of Fees</b>			<b>206.70</b>	<b>\$44,932.00</b>	
<b>VP's Pro Rata Share</b>			<b>50%</b>	<b>103.35</b>	<b>\$22,466.00</b>

**Subsection D-4  
VALIANT FORECLOSURE  
Fees Attributed Jointly  
to NIR, VP, and JV**

Trans Date	Atty	Rate	Hours to Bill	Amount	
09/02/2014	10	\$270.00	1.4	\$378.00	Analyze pleadings and litigation issues
09/04/2014	10	\$270.00	0.8	\$216.00	Telephone conference with G. Finney regarding 7 day extension to answer complaint; analyze email from client and draft/analyze reply to same; analyze pleadings filed by North Idaho Resorts and HOA related to the motion to substitute Valiant as the real party in interest
09/12/2014	10	\$270.00	2.1	\$567.00	Analyze email from C. Dodson; draft/edit acceptance of service; analyze email from T. McLaughlin regarding issues with maintenance facility; telephone conference with G. Finney regarding status of JV, LLC answer and request extension on behalf of ACI; analyze letter from HOA and email client regarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. Lynskey; analyze amended litigation guarantee; email client
09/17/2014	6	\$160.00	0.6	\$96.00	Study matrix for deadlines; revise same
10/07/2014	10	\$270.00	3.1	\$837.00	Analyze/draft/edit affirmative defenses to JV cross claim; analyze/edit answer to JV, LLC claims; analyze motion filed by VP, LLC; Jc J. Breaux re: golf course; Jc and emails with client; confer w/ J. Sykes
10/08/2014	6	\$160.00	0.6	\$96.00	Strategy conference with R. Stacey
11/20/2014	10	\$270.00	2.3	\$621.00	Draft/analyze/edit motion to amend third party complaint; research same; analyze service issues
11/26/2014	6	\$270.00	0.4	\$108.00	Confer with R. Stacey; study scheduling order
12/03/2014	6	\$270.00	4.2	\$1,134.00	Begin study of real property record
12/04/2014	6	\$270.00	3.2	\$864.00	Continue study of real property records
12/08/2014	6	\$270.00	3.4	\$918.00	Study pleadings in prior cases related to summary judgment motions
12/09/2014	6	\$270.00	3.4	\$918.00	Begin preparation of statement of facts for summary judgment motion
12/10/2014	6	\$270.00	5.2	\$1,404.00	Study Reeves affidavit and pleadings; continue preparation of statement of facts
12/11/2014	10	\$270.00	2.6	\$702.00	Analyze project documents; outline summary judgment arguments; draft notice of appearance on behalf of HLT and independent Mortgage; draft/analyze/edit stipulation to judgment against HOA and Panhandle Management
12/11/2014	6	\$270.00	3.1	\$837.00	Research legal arguments for summary judgment motion and supporting pleadings
12/12/2014	6	\$270.00	2.2	\$594.00	Begin preparation of summary judgment motion and supporting pleadings; legal arguments
12/15/2014	6	\$270.00	7.4	\$1,998.00	Continue preparation of summary judgment; revise statement of facts and legal argument
12/16/2014	10	\$270.00	2.4	\$648.00	Confer with J. Sykes; analyze project documents; analyze legal description
12/16/2014	6	\$270.00	2.1	\$567.00	Research issues related to summary judgment motion
12/16/2014	6	\$270.00	4.2	\$1,134.00	Study research memorandum and related regulations
12/17/2014	6	\$270.00	6	\$1,620.00	Continue preparation of summary judgment motion and supporting pleadings; telephone conference with J. Hamilton; study real property records
12/22/2014	10	\$270.00	0.6	\$162.00	Research motion for judgment on the pleadings
12/30/2014	6	\$270.00	3.4	\$918.00	Prepare declarations to support summary judgment memorandum
12/30/2014	6	\$270.00	3.2	\$864.00	Prepare interrogatories, requests for production and requests for admission to propound upon JV, North Idaho Resorts and VP
01/05/2015	6	\$270.00	0.9	\$243.00	Telephone conference with clients
01/05/2015	6	\$270.00	3.1	\$837.00	Continue preparation of summary judgment briefing
01/05/2015	6	\$270.00	1.2	\$324.00	Correspondence with client; research foreclosure sale issues
01/06/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes

01/09/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes regarding summary judgment issues
01/09/2015	6	\$270.00	3.9	\$1,053.00	Review and revise memorandum in support of motion for summary judgment
01/12/2015	6	\$270.00	5.2	\$1,404.00	Revise summary judgment memorandum; study Union Bank case
01/12/2015	6	\$270.00	0.3	\$81.00	Telephone conference with D. Shafer
01/13/2015	6	\$270.00	3.3	\$891.00	Continue drafting summary judgment memorandum and supporting pleadings
01/14/2015	6	\$270.00	5	\$1,350.00	Prepare summary judgment supporting declaration of counsel; revise summary judgment memorandum
01/15/2015	6	\$270.00	4.3	\$1,296.00	Revise summary judgment legal arguments; final declaration of counsel
01/18/2015	6	\$270.00	3.5	\$945.00	Telephone conference with client; final summary judgment pleadings
01/18/2015	6	\$250.00	2.9	\$725.00	Prepare documents requested by client
01/20/2015	6	\$250.00	3.2	\$800.00	Prepare discovery requests to propound upon JV, NIR and VP
01/20/2015	6	\$250.00	1.3	\$325.00	Outline argument for summary judgment hearing
01/21/2015	6	\$270.00	0.6	\$162.00	Telephone conference with D. Shafer
01/21/2015	6	\$250.00	2.7	\$675.00	Review and revise discovery requests to JV, NIR and VP
01/22/2015	6	\$250.00	0.5	\$125.00	Correspondence with clients
01/23/2015	6	\$250.00	2.5	\$625.00	Revise discovery requests (interrogatories, requests for production and requests for admission) to propound upon JV, NIR and VP
01/28/2015	6	\$250.00	2.7	\$675.00	Final discovery requests for service upon JV, NIR and VP
02/03/2015	18	\$100.00	3.3	\$380.00	Research requirements related to clubhouse
02/03/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes regarding litigation
02/04/2015	18	\$100.00	4.1	\$410.00	Review case law; outline argument
02/05/2015	10	\$250.00	2.1	\$525.00	Review/analyze Summary Judgment responses
02/05/2015	10	\$250.00	0.3	\$75.00	Email client regarding same
02/05/2015	18	\$100.00	3.9	\$390.00	Draft research memorandum
02/06/2015	10	\$270.00	0.6	\$162.00	Analyze emails from client and confer with J. Sykes regarding same
02/09/2015	6	\$250.00	0.9	\$225.00	Prepare stipulation to reschedule summary judgment hearing
02/12/2015	6	\$250.00	0.2	\$50.00	Correspondence with S. Weeks and G. Finney regarding possible settlement conference
02/13/2015	6	\$250.00	0.9	\$225.00	Correspondence with clients
02/18/2015	6	\$270.00	2.6	\$702.00	Correspondence with client; review plat map; telephone conference with D. Shafer
02/19/2015	6	\$270.00	1.1	\$297.00	Correspondence with D. Shafer regarding expert issues
02/23/2015	10	\$250.00	0.9	\$225.00	Review/analyze emails from client and analyze/draft responses to the same
02/23/2015	10	\$250.00	2.1	\$525.00	Review/analyze memorandums filed in opposition to client's motions for summary judgment
02/24/2015	6	\$250.00	4.2	\$1,050.00	Continue preparation of reply memoranda to summary judgment oppositions by JV, NIR and VP
02/24/2015	6	\$270.00	2.2	\$594.00	Prepare letter to Fidelity
03/03/2015	6	\$250.00	2.3	\$700.00	Prepare correspondence to Fidelity
03/11/2015	6	\$250.00	2.2	\$550.00	Begin preparation for hearing on summary judgment motions
03/12/2015	6	\$250.00	0.3	\$75.00	Correspondence with D. Shafer
03/12/2015	6	\$270.00	0.3	\$81.00	Correspondence with D. Shafer regarding expert issues
03/13/2015	6	\$250.00	1.2	\$300.00	Telephone conference with B. Kramer and W. Haberman
03/16/2015	6	\$250.00	0.7	\$175.00	Continue preparation for hearing on summary judgment motions
03/16/2015	10	\$250.00	0.6	\$150.00	Travel to and from meeting with D. Shafer
03/16/2015	10	\$250.00	1.7	\$425.00	Prepare for and attend meeting with D. Shafer
03/16/2015	10	\$250.00	0.6	\$150.00	Analyze documents from D. Shafer
03/16/2015	6	\$250.00	2	\$500.00	Appear for/attend hearing
03/16/2015	6	\$250.00	0.2	\$50.00	Telephone conference with D. Shafer
03/16/2015	6	\$250.00	0.5	\$125.00	Review/analyze maps
03/16/2015	10	\$270.00	0.6	\$162.00	Travel to and from meeting with D. Shafer
03/16/2015	10	\$270.00	1.7	\$459.00	Prepare for and attend meeting with D. Shafer regarding expert issues
03/18/2015	10	\$270.00	0.6	\$162.00	Analyze documents from D. Shafer
03/18/2015	6	\$270.00	0.2	\$54.00	Telephone conference with D. Shafer
03/18/2015	6	\$270.00	0.5	\$135.00	Review/analyze documentation prepared by D. Shafer
03/17/2015	10	\$250.00	0.2	\$50.00	Telephone conference with B. Anderson regarding status of hearing
03/17/2015	6	\$250.00	3.3	\$875.00	Travel to Spokane, Washington for summary judgment hearing
03/18/2015	6	\$250.00	6.5	\$1,625.00	Travel to Sandpoint, Idaho for summary judgment hearing and return to Spokane, Washington
03/18/2015	6	\$250.00	3.2	\$800.00	Prepare for summary judgment hearing
03/18/2015	6	\$250.00	0.7	\$175.00	Telephone conference with clients following summary judgment hearing
03/18/2015	6	\$250.00	3.5	\$875.00	Return to Boise, Idaho from Spokane, Washington
03/19/2015	6	\$250.00	0.2	\$50.00	Review and respond to correspondence from W. Haberman
03/23/2015	6	\$250.00	2.1	\$525.00	Review correspondence from and telephone conference with D. Shafer
03/23/2015	6	\$270.00	2.1	\$567.00	Review correspondence from and telephone conference with D. Shafer
03/24/2015	6	\$270.00	1.1	\$297.00	Correspondence with B. Kramer; telephone conference with S. Nieman
03/24/2015	6	\$270.00	1.8	\$486.00	Correspondence with D. Shafer regarding expert issues; correspondence with clients regarding same
03/24/2015	6	\$250.00	0.9	\$225.00	Correspondence with D. Shafer
03/24/2015	6	\$250.00	0.6	\$150.00	Review matrix of properties
03/24/2015	6	\$250.00	0.3	\$75.00	Correspondence with clients
03/25/2015	6	\$250.00	0.2	\$50.00	Telephone conference with D. Shafer
03/25/2015	6	\$270.00	0.7	\$189.00	Correspondence with B. Kramer; telephone conference with J. Miller; telephone conference with S. Nieman
03/25/2015	6	\$270.00	0.2	\$54.00	Telephone conference with D. Shafer regarding expert issues
03/26/2015	6	\$270.00	0.9	\$243.00	Telephone conference with D. Shafer; review documentation; correspondence with clients regarding same
03/26/2015	6	\$250.00	1.3	\$325.00	Prepare correspondence to D. Kreifels
03/26/2015	6	\$250.00	0.4	\$100.00	Review email correspondence
03/26/2015	6	\$250.00	0.4	\$100.00	Telephone conference with D. Shafer
03/26/2015	6	\$250.00	0.3	\$75.00	Review maps

03/26/2015	6	\$250.00	0.2	\$50.00	Correspondence with clients
03/30/2015	10	\$250.00	2.1	\$525.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6	\$250.00	0.6	\$150.00	Telephone conference with D. Shafer
03/30/2015	6	\$250.00	0.6	\$150.00	Study drawings
03/30/2015	6	\$250.00	0.4	\$100.00	Telephone conference with clients regarding same
03/30/2015	10	\$270.00	2.1	\$567.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6	\$270.00	1.6	\$432.00	Telephone conference with D. Shafer regarding expert issues; telephone conference with clients regarding same
03/31/2015	6	\$250.00	0.8	\$200.00	Telephone conference with D. Shafer and W. Haberman
03/31/2015	6	\$270.00	0.8	\$216.00	Telephone conference with D. Shafer and W. Haberman
04/03/2015	6	\$270.00	1.2	\$324.00	Review/analyze documentation prepared by D. Shafer
04/03/2015	6	\$270.00	0.6	\$162.00	Telephone conference with D. Shafer
04/06/2015	6	\$270.00	0.4	\$108.00	Telephone conference with S. Neiman
04/06/2015	10	\$270.00	2.7	\$729.00	Analyze documentation prepared by D. Shafer; prepare outline regarding the same; telephone conference with D. Shafer regarding the same
04/08/2015	6	\$270.00	0.3	\$81.00	Prepare letter to S. Neiman
04/10/2015	6	\$270.00	0.9	\$243.00	Telephone conference with D. Shafer regarding expert issues
04/14/2015	6	\$270.00	1.1	\$297.00	Begin preparation of Shafer declaration
04/15/2015	6	\$270.00	0.2	\$54.00	Telephone conference with D. Shafer regarding expert issues
04/15/2015	6	\$250.00	0.5	\$125.00	Correspondence with clients
04/15/2015	6	\$250.00	1.1	\$275.00	Study summary judgment ruling
04/16/2015	6	\$250.00	0.2	\$50.00	Telephone conference with T. McLaughlin
04/16/2015	6	\$250.00	0.3	\$75.00	Correspondence with client
04/16/2015	10	\$270.00	1.6	\$432.00	Analyze Summary Judgment decision; email client regarding the same and analyze responses
04/17/2015	10	\$270.00	1.6	\$432.00	Prepare for and attend conference call with clients
04/17/2015	6	\$270.00	1.1	\$297.00	Telephone conference with B. Kramer and others
04/21/2015	6	\$250.00	0.4	\$100.00	Correspondence with Fidelity
04/24/2015	10	\$270.00	1.6	\$972.00	Confer with J. Sykes regarding litigation
04/24/2015	6	\$270.00	1.3	\$351.00	Confer with R. Stacey regarding litigation
04/27/2015	10	\$270.00	0.9	\$243.00	Telephone conference with B. Haberman regarding summary judgment; confer with J. Sykes regarding same; email client; analyze client response
05/06/2015	10	\$270.00	3.3	\$891.00	Confer with J. Sykes regarding issues related to litigation
05/07/2015	10	\$270.00	0.6	\$162.00	Analyze emails from client; email client regarding the same
05/08/2015	10	\$270.00	3.6	\$972.00	Research legal issues related to summary judgment
05/09/2015	10	\$270.00	0.1	\$27.00	Analyze email from client; email J. Sykes regarding same
05/11/2015	10	\$270.00	4.1	\$1,107.00	Analyze information from D. Shafer; outline Shafer declaration; analyze email from opposing counsel
06/17/2015	15	\$225.00	5.7	\$1,292.50	Travel from Boise to Sandpoint, prepare for hearing, attend hearing, telephone conference with Brian Kramer
06/17/2015	10	\$270.00	0.6	\$162.00	Confer with C. Nicholson regarding outcome of hearing on motion for final judgment
06/18/2015	15	\$225.00	2.1	\$472.50	E-mail hearing update to B. Haberman; travel Spokane to Boise
06/22/2015	15	\$195.00	2.8	\$546.00	Research motion to reconsider
06/22/2015	15	\$195.00	1.9	\$370.50	Research motion to reconsider and opposition to summary judgment
06/23/2015	6	\$250.00	1.7	\$425.00	Analyze client documents and property records
06/23/2015	6	\$250.00	0.2	\$50.00	Correspondence with clients
06/23/2015	15	\$195.00	1.7	\$331.50	Research regarding standard of review for 11(a)(2)(B) motion
06/23/2015	10	\$250.00	1	\$250.00	Analyze memorandum decision and order and confer with J. Sykes regarding the same
06/23/2015	10	\$250.00	0.4	\$100.00	Email client
06/23/2015	15	\$225.00	0.1	\$22.50	Review of Memorandum Decision and Order regarding motion for Entry of Final Judgment
06/23/2015	6	\$270.00	1.2	\$324.00	Review draft of final judgment; correspondence with Fidelity
06/24/2015	15	\$195.00	0.9	\$175.50	Begin drafting memoranda in opposition to JVVP/NIR motion to reconsider
06/24/2015	15	\$195.00	0.8	\$156.00	Research I.C. 55-806
06/24/2015	15	\$195.00	1.4	\$273.00	Continue drafting memoranda in Opposition to JVVP/NIR Motions to Reconsider
06/24/2015	15	\$195.00	0.5	\$97.50	Research standard of review
06/24/2015	15	\$195.00	1.3	\$253.50	Research standard of review
06/25/2015	15	\$195.00	3.2	\$624.00	Continue drafting memoranda in opposition to JVVP/NIR Motions to Reconsider
06/25/2015	15	\$195.00	0.8	\$156.00	Review of Chuck Reeves deposition from Union Bank case
06/25/2015	15	\$195.00	1.2	\$234.00	Research submission of admissible evidence
06/26/2015	15	\$195.00	7.2	\$1,404.00	Continue Drafting memoranda in opposition to JVVP/NIR Motions to reconsider
06/26/2015	6	\$250.00	1.5	\$375.00	Draft affidavits and motion in support of motions to reconsider
06/26/2015	10	\$250.00	0.5	\$125.00	Telephone conference with client
06/29/2015	15	\$195.00	1.6	\$312.00	Finish Drafting memoranda in opposition to JVVP/NIR Motions to Reconsider
06/29/2015	6	\$250.00	1.9	\$475.00	Revise motions and affidavits in support of oppositions to motions to reconsider
06/29/2015	10	\$250.00	0.6	\$150.00	Confer with J. Sykes and C. Nicholson
06/30/2015	10	\$270.00	0.4	\$108.00	Conference call with D. Shafer
06/30/2015	10	\$270.00	1	\$270.00	Research statute of frauds
07/01/2015	10	\$250.00	2.8	\$700.00	Analyze/draft/edit/analyze affidavits in support of memorandums in opposition to motions to reconsider
07/02/2015	10	\$270.00	0.3	\$81.00	Analyze emails from D. Shafer to R. Lynskey; email D. Shafer regarding the same
07/04/2015	10	\$270.00	0.1	\$27.00	Analyze email from B. Haberman
07/06/2015	10	\$270.00	2.4	\$648.00	Analyze site maps and other documents from D. Shafer; analyze multiple emails from D. Shafer; draft responses to same; (3) telephone conference with D. Shafer; email B. Haberman;

07/06/2015	10	\$250.00	1.1	\$275.00	analyze multiple emails from B. Haberman and respond to the same Review/analyze issues with service of oppositions to motion to reconsider
07/06/2015	10	\$250.00	1.4	\$350.00	Draft/revise motion to vacate hearing date to serve opposition briefing
07/07/2015	10	\$250.00	3.1	\$775.00	Prepare for motion to reconsider
07/07/2015	10	\$250.00	0.3	\$75.00	Telephone conference with court clerk regarding waiver of objection for untimely filing
07/07/2015	10	\$250.00	0.1	\$25.00	Analyze email from clerk regarding waiver of objection for untimely filing
07/07/2015	10	\$250.00	0.3	\$75.00	Email client regarding status
07/07/2015	6	\$270.00	0.6	\$162.00	Confer with R. Stacey
07/08/2015	6	\$270.00	0.9	\$243.00	Research tax deeds; confer with R. Stacey regarding same
07/08/2015	15	\$225.00	0.2	\$45.00	Analysis of redemption deed statutes with J. Sykas
07/08/2015	10	\$270.00	0.6	\$162.00	Analyze emails from D. Shafer and respond to the same; analyze email from D. Staples; telephone conference with W. Haberman re same; analyze emails from W. Haberman
07/08/2015	10	\$250.00	9.7	\$2,425.00	Travel to and from Sandpoint, Idaho
07/08/2015	10	\$250.00	3.4	\$850.00	Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider
07/09/2015	10	\$250.00	2.7	\$675.00	Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same
07/09/2015	10	\$250.00	0.3	\$75.00	Analyze email from client
07/09/2015	10	\$250.00	0.2	\$50.00	Draft/analyze response to client email
07/09/2015	10	\$270.00	3.9	\$1,053.00	Prepare for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer and B. Haberman; analyze documents from D. Shafer; analyze property on Bonner County Assessor's website
07/10/2015	10	\$270.00	2.9	\$793.00	Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer
07/13/2015	10	\$270.00	4.3	\$1,161.00	Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman; draft/analyze email to him regarding the same
07/22/2015	6	\$270.00	1.1	\$297.00	Review scheduling order; attend pretrial conference
07/22/2015	15	\$225.00	1.7	\$382.50	Research regarding water rights; telephone conference regarding same;
07/22/2015	10	\$270.00	6.1	\$1,637.00	Outline changes to judgment and foreclosure decree per court's memorandum decision; analyze emails from C. Reeves and client; confer with C. Nicholson and J. Sykas regarding the same; draft/analyze multiple emails to clients regarding same; confer with local counsel regarding the same; analyze emails from client and C. Reeves; perform legal research re same; analyze documents from D. Shafer and forward same to client
07/22/2015	10	\$250.00	2.9	\$725.00	Analyze decision denying motions to reconsider
07/22/2015	10	\$250.00	1	\$250.00	Email and telephone conferences (3) with client
07/23/2015	10	\$250.00	1.6	\$400.00	Analyze/draft/edit changes to the judgment per court's memorandum decision denying motion to reconsider.
07/23/2015	10	\$270.00	3.3	\$891.00	Analyze/draft/edit changes to the decree of foreclosure per court's memorandum decision; analyze litigation guarantee; request copies of recorded instruments from First American
07/23/2015	8	\$270.00	0.6	\$162.00	Review/analyze judgment and order of sale
07/24/2015	15	\$225.00	1.4	\$315.00	Research water rights
07/24/2015	10	\$270.00	4.1	\$1,107.00	Analyze documents from B. Haberman; email D. Shafer; analyze emails from D. Shafer regarding same; verify accuracy of plats; research legal issues
07/24/2015	6	\$270.00	0.4	\$108.00	Review/analyze decree of foreclosure
07/27/2015	10	\$270.00	0.4	\$108.00	Analyze emails from B. Haberman and respond to the same; analyze email from R. Myers and respond to the same
07/29/2015	6	\$250.00	2.1	\$525.00	Prepare correspondence regarding decisions issued by court on motions for reconsideration
07/28/2015	10	\$250.00	0.2	\$50.00	Analyze emails from R. Meyers and B. Haberman
07/29/2015	10	\$270.00	1.6	\$432.00	Analyze email from R. Myers; analyze email from B. Haberman; analyze emails from B. Haberman to R. Myers; email B. Haberman; prepare for and telephone conference with B. Haberman; email title company; analyze court order vacating hearing on proposed order of sale and requesting Order for entry granting the same; telephone conference with (2) court clerk and advise of preference for hearing to proceed
07/30/2015	10	\$270.00	0.3	\$216.00	Email R. Myers regarding teleconference to discuss status of case; email B. Haberman regarding the same; analyze email from B. Haberman; leave voicemail for court clerk re: order vacating hearing on proposed order of sale; telephone conference with court clerk regarding the same
07/31/2015	10	\$250.00	2.4	\$600.00	Analyze documents from Bonner County Assessor
08/03/2015	10	\$270.00	1.6	\$432.00	Analyze utility easement documents
08/05/2015	10	\$270.00	11.5	\$3,132.00	Prepare for hearing; travel to Sandpoint, ID and back to Boise, ID; attend and argue in favor of motion at hearing; coordinate with court for execution of judgment; deliver and record judgment at Bonner County Recorder's Office; telephone conference with B. Kramer regarding outcome of hearing; B. Haberman regarding outcome of hearing
08/06/2015	18	\$100.00	6.1	\$610.00	Research foreclosure sales
08/06/2015	15	\$225.00	3.1	\$697.50	Research regarding foreclosure sales
08/08/2015	10	\$250.00	0.2	\$50.00	Analyze email from Fidelity
08/07/2015	18	\$100.00	5.5	\$550.00	Research credit bidding
09/02/2015	10	\$270.00	8.3	\$2,241.00	Travel from Boise, ID to Sandpoint, Idaho for the motion to alter/reconsider order of sale; prepare for hearing on Valiant's motion to alter or reconsider foreclosure decree and order of sale; confer with




09/02/2015	6	\$250.00	2.7	\$675.00	J. Sykes regarding the same; telephone conference with clients; Prepare for hearing on third motion for reconsideration
09/02/2015	6	\$250.00	3.2	\$900.00	Travel from Boise to Sandpoint, Idaho for hearings
09/02/2015	6	\$250.00	1.7	\$425.00	Attend hearings
09/02/2015	6	\$250.00	1.6	\$400.00	Telephone conference with clients regarding outcome of hearings
09/03/2015	6	\$250.00	3.2	\$800.00	Return to Boise from Sandpoint, Idaho
09/03/2015	10	\$250.00	0.2	\$50.00	Analyze emails and attachments from B. Haberman
09/03/2015	10	\$250.00	1	\$250.00	Telephone conference with B. Haberman
09/03/2015	10	\$250.00	3	\$750.00	Travel from Sandpoint, ID to Boise, ID
09/03/2015	15	\$225.00	0.2	\$45.00	Respond to clients' request for documents
09/04/2015	10	\$250.00	1.9	\$475.00	Analyze court ruling granting motion to reconsider
09/08/2015	10	\$250.00	0.3	\$75.00	Telephone conference with B. Haberman
09/08/2015	10	\$250.00	0.5	\$125.00	Analyze order setting trial and pretrial order
09/10/2015	10	\$250.00	6.6	\$1,650.00	Analyze Pensco and MF08 loan documents, real property records and other documents of record in this case in preparation for motion to reconsider and in support of motion for summary judgment and confer with C. Nicholson regarding the same
09/14/2015	15	\$195.00	1.8	\$351.00	Begin drafting Memo Supp. Motion to Reconsider the Court's 9-4-15 decision; confer with J. Sykes and R. Stacey
09/14/2015	10	\$250.00	1.4	\$350.00	Outline arguments for motion to reconsider
09/14/2015	10	\$250.00	2.4	\$600.00	Outline arguments for motion for summary judgment
09/14/2015	10	\$250.00	1.5	\$375.00	Meet to discuss motion to reconsider summary judgment and objection to proposed judgment
09/14/2015	6	\$250.00	1.9	\$475.00	Outline issues for third summary judgment motion
09/15/2015	15	\$195.00	0.2	\$39.00	Discuss research project with C. Tipton
09/15/2015	15	\$195.00	0.8	\$156.00	Review and analysis of MF08 All-Inclusive Mortgage & Loan Agreement to prepare B. Ng Decl.
09/15/2015	18	\$100.00	2.3	\$230.00	Begin preparing Ng Decl.
09/16/2015	18	\$100.00	3.8	\$380.00	Discussion with C. Nicholson; Research regarding inconsistent declarations
09/16/2015	15	\$195.00	3.5	\$682.50	Discussion with C. Nicholson; Research regarding inconsistent declarations
09/17/2015	15	\$195.00	0.2	\$39.00	Draft Barney Ng decl.
09/17/2015	15	\$195.00	0.3	\$58.50	Correspondence with W. Haberman
09/17/2015	15	\$195.00	1.3	\$253.50	Review and analyze POBD mortgages with R.E. Loans, MF08 & Pensco
09/17/2015	15	\$195.00	0.9	\$175.50	Review and analyze loan agreements between POBD and RE Loans/MF08
09/17/2015	15	\$195.00	0.9	\$175.50	Review and analysis of notes between POBD & RE Loans, Pensco & MF08
09/17/2015	15	\$195.00	0.6	\$117.00	Review and analysis of Pensco related documents received from B. Ng
09/17/2015	15	\$195.00	2.1	\$409.50	Review, analyze and compare Borrowers Funding Authorization & Analyze with Settlement Statement relied upon by VP/NIR/JV and other closing documents (check stub to POBD, CA disclosure form, etc.)
09/17/2015	6	\$250.00	0.3	\$75.00	Review scheduling order regarding expert disclosures
09/17/2015	6	\$250.00	3.2	\$800.00	Study second summary judgment motion and supporting pleadings
09/17/2015	6	\$250.00	0.9	\$225.00	Telephone conference with F. Elsaesser
09/17/2015	6	\$250.00	0.3	\$75.00	Telephone conference with W. Haberman
09/17/2015	18	\$100.00	4.5	\$450.00	Research/Draft Argument regarding inconsistent Decl.
09/17/2015	6	\$270.00	1.2	\$324.00	Telephone conference with F. Elsaesser regarding summary judgment motion; telephone conference with W. Haberman
09/18/2015	15	\$195.00	0.1	\$19.50	Review Notice regarding proposed Judgment between VP, NIR & JV, order vacating 8/5/15 Judgment, and order vacating 3/5/15 decree of foreclosure
09/18/2015	18	\$100.00	1.2	\$120.00	Research regarding Inconsistent Decl.
09/18/2015	15	\$195.00	0.8	\$156.00	Telephone conference with J. Sykes, W. Haberman and E. Ford
09/18/2015	15	\$195.00	2.4	\$468.00	Continue drafting Ng declaration
09/18/2015	9	\$250.00	1.4	\$350.00	Revise declaration of B. Ng
09/18/2015	9	\$250.00	0.3	\$75.00	Telephone conference with F. Elsaesser
09/19/2015	15	\$195.00	0.2	\$39.00	Correspondence with Janet Robnett regarding representation of POBD in conjunction with closing of RE Loans, Pensco and MF08 loans
09/20/2015	15	\$195.00	1.3	\$253.50	Complete initial draft of Ng Decl.
09/21/2015	15	\$195.00	0.9	\$175.50	Prepare for and telephone conference with J. Sykes, W. Haberman and B. Ng
09/21/2015	15	\$195.00	0.3	\$58.50	Review correspondence from W. Haberman
09/21/2015	15	\$195.00	1.8	\$351.00	Revise Ng Decl.
09/21/2015	15	\$195.00	0.2	\$39.00	Draft Third Motion for Summary Judgment
09/21/2015	15	\$195.00	2	\$390.00	Begin Drafting Memo. Supp. 3rd Mot. for Summary Judgment
09/21/2015	6	\$250.00	1.2	\$300.00	Telephone conference with B. Ng
09/21/2015	18	\$100.00	6.2	\$620.00	Research/Draft Argument regarding inconsistent Decl.
09/22/2015	18	\$100.00	3.2	\$320.00	Research regarding inconsistent Decl.
09/22/2015	6	\$270.00	0.9	\$243.00	Correspondence with S. Rasor
09/22/2015	6	\$270.00	1.1	\$297.00	Prepare documents for Rasor review
09/22/2015	15	\$195.00	0.6	\$156.00	Finish revisions to second draft of Ng Declaration
09/22/2015	15	\$195.00	5.1	\$994.50	Continue draft Memo Supp 3rd MSJ
09/22/2015	6	\$250.00	0.7	\$175.00	Review and revise declaration of B. Ng
09/22/2015	6	\$250.00	1.4	\$350.00	Correspondence with G. Finney regarding depositions of C. Reeves and First American
09/22/2015	6	\$250.00	0.8	\$200.00	Correspondence with W. Haberman
09/22/2015	6	\$250.00	0.3	\$75.00	Correspondence regarding Reeves deposition
09/23/2015	15	\$195.00	8.3	\$1,618.50	Continue draft Summary Judgment
09/23/2015	15	\$195.00	0.6	\$117.00	Strategy discussion with J. Sykes and C. Tipton
09/23/2015	18	\$100.00	10.2	\$1,020.00	Draft Memo/Argument regarding Shafer Decl.
09/24/2015	15	\$195.00	6.1	\$1,189.50	Finish drafting Memo Supp. 3rd Summary Judgment
09/24/2015	6	\$250.00	3.9	\$975.00	Review and revise summary judgment memorandum and supporting pleadings

09/25/2015	6	\$250.00	0.2	\$50.00	Correspondence wit S. Rasor
09/29/2015	10	\$250.00	2.7	\$675.00	Outline discovery to NIR and JV, LLC
09/29/2015	10	\$250.00	0.7	\$175.00	Analyze scheduling order
09/29/2015	10	\$250.00	1.3	\$325.00	Outline deposition notices to C. Reevas and R. Villelli
09/29/2015	6	\$250.00	1.2	\$300.00	Outline issues regarding depositions, discovery and summary judgment motion
10/01/2015	10	\$250.00	3.6	\$900.00	Outline requests for admission and interrogatories to NIR, VP and JV
10/01/2015	10	\$250.00	0.6	\$150.00	Telephone conference with client
10/01/2015	10	\$250.00	1.1	\$275.00	Review/analyze project documents
10/08/2015	10	\$250.00	0.7	\$175.00	Analyze legal descriptions
10/08/2015	10	\$250.00	0.8	\$200.00	Review/analyze emails from D. Shafer
10/08/2015	10	\$250.00	0.5	\$125.00	Telephone conference with D. Shafer
10/11/2015	10	\$250.00	0.2	\$50.00	Review/analyze email from client
10/12/2015	10	\$250.00	0.6	\$150.00	Email clients
10/12/2015	10	\$250.00	0.3	\$75.00	Analyze emails from client regarding the same
10/13/2015	10	\$250.00	0.3	\$75.00	Email C. Reevas regarding availability for deposition
10/14/2015	15	\$195.00	0.7	\$136.50	Review and analysis of Ng Bankruptcy decl.
10/14/2015	6	\$250.00	1.1	\$275.00	Review/analyze pleadings filed by NIR, JV and VP
10/14/2015	6	\$250.00	1.1	\$275.00	Correspondence with client
10/14/2015	10	\$250.00	1.3	\$325.00	Analyze rules of civil procedure and other legal issues
10/14/2015	10	\$250.00	0.9	\$225.00	Telephone conference with B. Haberman
10/14/2015	10	\$250.00	0.4	\$100.00	Analyze emails from B. Haberman
10/14/2015	10	\$250.00	0.4	\$100.00	Analyze pleadings filed by B. Ng
10/14/2015	10	\$250.00	0.3	\$75.00	Draft notice for client to attend hearing telephonically
10/15/2015	6	\$250.00	1.9	\$475.00	Review/analyze correspondence from clients
10/15/2015	10	\$250.00	0.7	\$175.00	Telephone conference with B. Haberman and B. Kramer
10/15/2015	10	\$250.00	1.8	\$450.00	Outline response
10/15/2015	10	\$250.00	0.5	\$150.00	Analyze emails from B. Haberman and B. Kramer
10/15/2015	10	\$250.00	0.6	\$150.00	Analyze/edit additional points
10/15/2015	10	\$250.00	0.2	\$50.00	Telephone conference with B. Haberman
10/15/2015	10	\$250.00	0.2	\$50.00	Analyze email from client
10/15/2015	10	\$250.00	0.3	\$75.00	Telephone conference with M. Hathaway
10/15/2015	10	\$250.00	2.3	\$575.00	Compile documents and email the same to M. Hathaway
10/16/2015	15	\$195.00	1.6	\$312.00	Draft/revise Decl/Aff Opp Third SJ Motion or alternative Request for Extension of Time to reply and revise supporting Nicholson decl
10/16/2015	10	\$250.00	0.6	\$150.00	Analyze emails from B. Haberman and B. Kramer
10/16/2015	10	\$250.00	1.1	\$275.00	Compile documents and email engineer
10/16/2015	10	\$250.00	0.6	\$150.00	Telephone conference with B. Haberman and B. Kramer
10/16/2015	6	\$270.00	1.9	\$513.00	Study FACTO title policies; draft correspondence to FATCO
10/16/2015	15	\$195.00	3.1	\$604.50	Research regarding breach of note/loan agreement
10/19/2015	15	\$195.00	1.8	\$351.00	Research breach of note/loan agreement
10/19/2015	10	\$250.00	1.7	\$425.00	Draft/analyze/edit affidavit of B. Ng
10/19/2015	10	\$250.00	1.1	\$275.00	Analyze documents related the foregoing reply pleadings
10/20/2015	15	\$195.00	1.1	\$214.50	Analysis of exhibits submitted by JV and NIR/VP in opp to 3rd SJ Motion
10/20/2015	15	\$195.00	0.2	\$39.00	Draft Nicholson Decl. Dated 10/20/15
10/20/2015	6	\$250.00	0.3	\$75.00	Review/analyze second Ng declaration
10/20/2015	6	\$250.00	0.8	\$200.00	Prepare status update
10/20/2015	6	\$250.00	4.1	\$1,025.00	Begin preparation for hearings on motions for reconsideration and second summary judgment motion
10/20/2015	10	\$250.00	0.4	\$100.00	Analyze emails from client
10/20/2015	10	\$250.00	0.3	\$75.00	Analyze/draft email to client
10/20/2015	10	\$250.00	0.2	\$50.00	Analyze client responses
10/20/2015	10	\$250.00	0.7	\$175.00	Draft/analyze/edit changes to B. Ng. Decl.
10/20/2015	10	\$250.00	0.2	\$50.00	Email B. Ng
10/20/2015	10	\$250.00	0.2	\$50.00	Telephone conference with B. Ng
10/20/2015	10	\$250.00	0.3	\$75.00	Draft/analyze changes
10/20/2015	10	\$250.00	0.1	\$25.00	Email the modified agreement to B. Ng
10/21/2015	15	\$195.00	0.7	\$136.50	Research regarding residual exception to hearsay rule
10/21/2015	15	\$195.00	0.9	\$175.50	Research regarding admissibility and use of impeachment evidence
10/21/2015	15	\$195.00	0.5	\$97.50	Research regarding business record exception to hearsay rule
10/22/2015	6	\$250.00	2.2	\$550.00	Continue preparation for hearings on motions for reconsideration and second summary judgment motion
10/22/2015	6	\$250.00	3	\$750.00	Travel to Sandpoint, Idaho
10/22/2015	10	\$250.00	5.1	\$1,275.00	Analyze briefing and prepare for hearing on motion for summary judgment
10/22/2015	10	\$250.00	2.9	\$725.00	Travel to Spokane, Washington
10/23/2015	6	\$250.00	5	\$1,250.00	Appear for/attend hearings on motions for reconsideration and second summary judgment motion
10/23/2015	6	\$250.00	1	\$250.00	Telephone conference with clients regarding outcome of hearings
10/23/2015	6	\$250.00	3	\$750.00	Return travel to Boise, Idaho
10/23/2015	10	\$250.00	7.5	\$1,875.00	Prepare for hearing and attend hearing and argue motion for summary judgment
10/23/2015	10	\$250.00	3	\$750.00	Travel to and from Spokane, WA to Sandpoint, ID
10/24/2015	10	\$250.00	3.8	\$950.00	Travel from Spokane, WA to Boise, ID
10/26/2015	15	\$195.00	0.9	\$175.50	Review mortgages
10/26/2015	6	\$250.00	2.9	\$725.00	Correspondence with D. Kraifets
10/26/2015	6	\$250.00	0.4	\$100.00	Review/analyze additional discovery to defendants
10/26/2015	6	\$250.00	0.9	\$225.00	Research issues regarding tax parcel sales
10/26/2015	10	\$250.00	1.1	\$275.00	Analyze previously proounded rogs and rfs
10/26/2015	10	\$250.00	3.1	\$775.00	Draft/analyze/edit rfs and rogs to defendants VP, NIR and JV
10/26/2015	10	\$250.00	0.3	\$200.00	Draft/analyze/edit expert witness disclosures
10/26/2015	10	\$250.00	0.4	\$100.00	Coordinate resumes and other information from experts for expert disclosures
10/26/2015	10	\$250.00	0.4	\$100.00	Draft/analyze/edit lay witness disclosures
10/26/2015	10	\$270.00	3.6	\$972.00	Analyze email from M. Hathaway; telephone conference with M. Hathaway regarding expert witness duties; conference call

				with M. Hathaway and D. Shafer regarding the same; analyze Shafer exhibits in preparation for conference call; analyze multiple emails back and forth between M. Hathaway and D. Shafer
10/27/2015	10	\$270.00	1.1	\$297.00 Analyze email from counsel for First American; draft/analyze/edit response to the same
10/27/2015	15	\$195.00	4.4	\$858.00 Analysis of documents produced by First American Title Co.
10/27/2015	10	\$250.00	0.3	\$75.00 Draft/analyze notices of service for discovery to JV, NIR and VP
10/27/2015	10	\$250.00	0.3	\$75.00 Draft/analyze email to counsel for First American re: deposition dates
10/27/2015	10	\$250.00	2.7	\$675.00 Analyze documents from Sandpoint Title
10/28/2015	9	\$250.00	1.2	\$300.00 Revise correspondence to D. Kreifels
10/28/2015	10	\$250.00	0.3	\$75.00 Email First American regarding documents produced to JV and NIR
10/28/2015	10	\$250.00	0.2	\$50.00 Analyze response to the same
10/28/2015	10	\$250.00	0.9	\$225.00 Analyze/draft/edit emails to counsel for First American
10/28/2015	10	\$250.00	0.3	\$75.00 Analyze responses to the same
10/28/2015	10	\$250.00	1.4	\$350.00 Compile documentation requested by First American and email the same to counsel for the same
10/28/2015	10	\$250.00	0.6	\$150.00 Compile documentation for D. Shafer
10/28/2015	10	\$250.00	0.3	\$75.00 Analyze email from court clerk
10/29/2015	10	\$250.00	1.6	\$400.00 Analyze emails from client and respond to the same
10/29/2015	10	\$250.00	0.9	\$225.00 Analyze emails (8) from M. Hathaway and D. Shafer
10/29/2015	10	\$250.00	0.3	\$75.00 Prepare for conference call with M. Hathaway and D. Shafer
10/29/2015	10	\$250.00	0.6	\$150.00 Participate in conference call
10/29/2015	10	\$250.00	0.3	\$75.00 Analyze email from G. Edson
10/29/2015	10	\$250.00	0.3	\$75.00 Email G. Edson
10/30/2015	15	\$195.00	0.5	\$97.50 Review of Disclosure Statement for Joint Chapter 11 Plan of Recognition filed in R.E. Loans Texas bankruptcy
10/30/2015	5	\$250.00	0.8	\$200.00 Review and respond to correspondence from D. Kreifels
10/30/2015	10	\$250.00	0.8	\$200.00 Analyze emails and voicemail from G. Edson and leave voicemail in response to the same
11/02/2015	15	\$195.00	2.1	\$409.50 Review/analyze R.E. Loans Bankruptcy filings
11/02/2015	9	\$250.00	1.8	\$400.00 Correspondence to D. Kreifels
11/02/2015	10	\$250.00	0.6	\$150.00 Telephone conference with G. Edson
11/02/2015	10	\$250.00	0.4	\$100.00 Telephone conference and email with client
11/03/2015	15	\$195.00	0.3	\$58.50 Continue Review of RE Loans bankruptcy
11/03/2015	10	\$250.00	0.6	\$150.00 Analyze letter from G. Edson
11/03/2015	10	\$250.00	0.3	\$75.00 Telephone conference and email with client
11/03/2015	10	\$270.00	1.2	\$324.00 Analyze emails from M. Hathaway and D. Shafer regarding same conference call with M. Hathaway and D. Shafer regarding same
11/04/2015	10	\$270.00	1.5	\$405.00 Telephone conference with B. Haberman; telephone conference with Bonner County regarding tax parcel issues; draft/analyze email to B. Haberman
11/05/2015	10	\$250.00	0.9	\$225.00 Analyze availability and strategy for taking depositions and leave voicemail for D. Marice regarding deposition dates
11/05/2015	10	\$250.00	0.5	\$125.00 telephone conference with paralegal for Susan Weeks and G. Finney regarding deposition
11/05/2015	10	\$250.00	0.4	\$100.00 telephone conference with P. DeAngeli regarding scope of Lynskey testimony
11/05/2015	10	\$250.00	0.3	\$75.00 Telephone conference with P. DeAngeli
11/05/2015	10	\$250.00	1.2	\$300.00 Analyze Sandpoint Title documents and email from M. Hathaway and telephone conference with Mr. Hathaway
11/10/2015	6	\$250.00	0.3	\$75.00 Revise correspondence with Fidelity
11/10/2015	10	\$250.00	3.7	\$925.00 Analyze FATCO documents and draft deposition outlines for the same
11/11/2015	15	\$195.00	1	\$195.00 Analysis of Court's Decision regarding 3rd MSJ and other motions heard on October 23, 2015
11/11/2015	6	\$250.00	1.2	\$300.00 Study memorandum decision and order on summary judgment motion
12/02/2015	6	\$250.00	0.9	\$225.00 Review/analyze order on summary judgment motion
8/23/2016	10	\$250.00	5.8	\$1,400.00 Research fees/costs
9/24/2016	10	\$250.00	6.1	\$1,525.00 Continue researching fees/costs; outline motion for fees and costs; analyze fee/cost invoices; telephone conference with B. Haberman; confer with J. Sykes; compile invoices
9/27/2016	10	\$250.00	3.3	\$1,575.00 Analyze/draft/edit motion for fees/costs
9/28/2016	10	\$250.00	3.7	\$1,375.00 Continue to analyze/draft/edit motion for fees/costs
9/29/2016	10	\$250.00	7.3	\$1,825.00 Continue to analyze/draft/edit motion for fees/costs
9/30/2016	10	\$250.00	7.8	\$1,950.00 Continue to analyze/draft/edit motion for fees/costs
7/1/2016	10	\$250.00	0.5	\$125.00 Analyze email from client; draft changes to proposal; emails and telephone conference with client
7/1/2016	17	\$90.00	5.5	\$90.00 Compile spreadsheets and organize invoices in support of memorandum of costs and fees
7/2/2016	17	\$90.00	11	\$90.00 Segregate spreadsheets and organize invoices in support of memorandum of costs and fees
7/3/2016	17	\$90.00	8.75	\$90.00 Segregate spreadsheets and organize invoices in support of memorandum of costs and fees; incorporate data within memorandum
7/4/2016	17	\$90.00	11.75	\$90.00 Finalize spreadsheets and identification of invoices in support of memorandum of costs and fees
7/5/2016	10	\$250.00	7.1	\$1,775.00 Analyze/draft/finalize motion for fees/costs
7/5/2016	17	\$90.00	8	\$720.00 Finalize work in connection with exhibits to memorandum of costs
<b>Subtotal of Fees</b>			<b>749.80</b>	<b>\$168,666.00</b>
<b>VP's Pro Rata Share</b>	<b>33.3%</b>		<b>249.93</b>	<b>\$56,222.00</b>
<b>VP's GRAND TOTAL:</b>			<b>921.73</b>	<b>\$214,561.25</b>

Richard L. Stacey, ISB #6800  
Jeff R. Sykes, ISB #5058  
Chad M. Nicholson, ISB #7506  
**McCONNELL WAGNER SYKES & STACEY PLLC**  
827 East Park Boulevard, Suite 201  
Boise, Idaho 83712  
Telephone: 208.489.0100  
Facsimile: 208.489.0110  
[stacey@mwslawyers.com](mailto:stacey@mwslawyers.com)  
[sykes@mwslawyers.com](mailto:sykes@mwslawyers.com)  
[nicholson@mwslawyers.com](mailto:nicholson@mwslawyers.com)

CLERK OF DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
OCT 20 10 P 4:43  
CLERK DISTRICT COURT  
  
DEPUTY

Attorneys For Valiant Idaho, LLC

**IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNER**

**GENESIS GOLF BUILDERS, INC.,**  
formerly known as  
**NATIONAL GOLF BUILDERS, INC.,**  
a Nevada corporation,

Plaintiff,

vs.

**PEND OREILLE BONNER  
DEVELOPMENT, LLC,**  
a Nevada limited liability company; *et al.*,

Defendants.

Case No. CV-09-1810

**VALIANT IDAHO, LLC'S  
MEMORANDUM IN OPPOSITION TO  
VP, INC.'S MOTION TO ALTER, AMEND  
AND RECONSIDER THE  
DECREE OF FORECLOSURE  
AND JUDGMENT**

**Honorable Barbara A. Buchanan**

**AND RELATED COUNTER, CROSS  
AND THIRD PARTY ACTIONS  
PREVIOUSLY FILED HEREIN.**

COMES NOW, Valiant Idaho, LLC ("Valiant"), by and through its attorneys of record, McConnell Wagner Sykes & Stacey PLLC, and files with this Court its Memorandum in Opposition to VP, Inc.'s Motion To Alter, Amend and Reconsider the Decree of Foreclosure and Judgment.

I.  
**INTRODUCTION**

On August 3, 2016, VP, Inc. ("VP") filed its Motion To Alter, Amend, and Reconsider the Decree of Foreclosure and Judgment ("Motion to Reconsider"). On August 4, 2016, the Court entered an Order Denying VP Inc.'s Request For Oral Argument on Motion to Alter, Amend and Reconsider and directed Valiant and/or JV, L.L.C. ("JV") to respond within seven days. The Court indicated it would issue a decision based upon written submissions of the parties. For the reasons set forth below, VP's Motion to Reconsider should be denied.

II.  
**ARGUMENT**

On June 22, 2016, Valiant filed its Memorandum in Support of Valiant Idaho, LLC's Motion For Order of Sale of Real Property ("Motion For Order of Sale"). In the Motion For Order of Sale, Valiant moved the Court for an order allowing for the sale of the real property subject to the RE Loans Mortgage, Pensco Mortgage and MF08 Mortgage. Valiant set forth the order in which it wanted the individual parcels sold. In detail, Valiant set forth its reasoning and legal support for its proposed order of sale. Valiant's Motion For Order of Sale included discussions of both the "two fund rule" and the "inverse order of alienation rule" as found in the Restatement 3d of Property, Mortgages, § 8.6.

On June 29, 2016, VP filed its Objection to [Valiant's] Second Motion For an Order of Sale of Real Property, setting forth its objections to Valiant's proposed order of sale. JV did not file any written opposition to Valiant's Motion For Order of Sale.

On July 6, 2016, the Court heard arguments on Valiant's Motion For Order of Sale and oppositions thereto. On July 14, 2106, the Court, after careful consideration of the parties' written submissions and existing law, entered its Order Re: Order of Sale of Real Property ("Order Re: Sale of Property") which was thereafter incorporated into Valiant's Decree of Foreclosure.

Now, as has been typical in this case, VP has filed a motion to reconsider the Decree of Foreclosure, Judgment and order of sale without setting forth any valid basis in law or fact for the Court to even consider amending or altering the Decree of Foreclosure or Judgment, or the Court's Order Re: Sale of Property.

A. The Court Properly Applied Equitable Marshalling Rules.

VP argues that the Court misapplied the "two funds rule" and should have applied the "inverse order of alienation rule." VP asserts that the "two funds" and/or "inverse order of alienation rule" are hard and fast rules that must be followed by the Court; that the Court misapplied the "two funds rule"; and, that the Court should order the sale of the property in the order set forth in Appendix B to VP's Motion to Reconsider. The sole basis for VP's Motion to Reconsider seems to be that "Valiant's order of sale did not accurately reflect the property encumbered by the JV mortgage and the effect that encumbrance has on the analysis of the inverse order of alienation rule." Memorandum in Support of [VP's Motion to Reconsider], p. 12.

The fundamental problem with VP's argument is that the Court correctly recognized that marshalling principles are equitable in nature and that there are no "hard and fast rules" for application of either the "two funds rule" or the "inverse order of alienation rule." As is set forth in the comments and illustrations to Restatement 3d of Property, Mortgages, § 6.8, Comments and Illustrations (2):

This section deals with the doctrine of marshalling, which may arise when the mortgage real estate consists of two or more parcels. Its purpose is to prevent unjust enrichment of the foreclosing mortgagee at the expense of holders of subordinate interests in the real estate. To accomplish this, marshalling restricts the discretion of the mortgagee in determining the order of foreclosure on multiple parcels of real estate covered by the same mortgage. Its premise is that while a mortgage may ultimately result to all of its security, the mortgagee should do so in an order that will preserve, to the extent possible, the interests of the other parties junior to the mortgage.

\*\*\*\*  
Marshalling is an equitable accommodation to the junior interest holder. As such, it is applicable only when its operation will be equitable. It is a general guide to the courts, not an absolute rule. Thus, marshalling is not applied when it would be detrimental to the foreclosing mortgagee or when its application would be unfair for other reasons. [Emphasis added.]

\*\*\*\*  
An order marshalling assets is generated by the court only when the holder of a junior interest who is entitled to its protection requests it. When foreclosure is by judicial action, the request is ordinarily made by motion to the court and must be made prior to the foreclosure sale itself. . . .

What is abundantly clear from the Restatement is that marshalling principles—both the "two funds rule" and the "inverse order of alienation rule"—are not hard and fast rules. The court may order a sale in such a fashion so that it treats the junior parties equitably. The Court in this case did just that; there is no reason to revisit the Court's reasoned decision.

The other fundamental problem with VP's arguments is that VP does not present the Court with any evidence that the current order of sale is inequitable or that a new order of sale would in any way alter the outcome of the sale, or that the current order of sale is in any way detrimental or unfair to VP. VP, in one sentence, makes the assertion that JV (*not VP*) is not treated equitably based upon the order of sale. VP is not in the position to make arguments or motions for JV and JV has not made any objection. Moreover, there is no evidence presented that JV is being treated inequitably.

VP's arguments are without any merit and should be rejected by the Court. VP's Motion to Reconsider appears to be made simply made to hinder and delay the orderly sale of the real property in question. Valiant should be awarded its attorneys' fees and costs incurred in having to respond to VP's frivolous motion.

**B. JV's First Position Lien Against Parcel 121 Is Supported By Evidence.**

VP argues that the Court's determination that Parcel 121 is only encumbered by JV's mortgage is not supported by competent evidence. VP argues that there was evidence presented that the 2007 RE Loans Mortgage was a first priority mortgage against Parcel 121 based upon the May 19, 2016 Declaration of C. Dean Shafer in Support of [Valiant's] Motion For Entry of Final Judgment filed May 20, 2015, but there is no evidence to establish that JV has a first priority interest in Parcel 121. VP's argument is incorrect.

Valiant is not claiming any interest in Parcel 121. Originally Valiant believed that the 2007 RE Loans Mortgage encumbered Parcel 121. That turned out to be incorrect; thus, Valiant is not seeking to sell and has no interest in Parcel 121. On the other hand, at trial JV introduced into evidence its 1995 mortgage (JV's Trial Ex. A) which encumbers all of the Idaho Club Property south



of Highway 200. It is uncontroverted that Parcel 121 is south of Highway 200. Therefore, once Valiant disclaimed any interest in Parcel 121, JV's interest was the only interest left that encumbered Parcel 121. JV's evidence presented at trial supports that conclusion and the evidence is not contested. Likewise, there is no evidence that VP has any interest in Parcel 121; thus, one must wonder why VP even bothers to raise the issue.

**C. Valiant's Judgment And Decree Of Foreclosure Are Not Overbroad.**

VP argues that Valiant's Judgment and Decree of Foreclosure are too broad. VP argues that the Decree of Foreclosure as entered by the Court wrongfully allows the sale of interests in the real property not encumbered by the RE Loans, Pensco and MF08 Mortgages. VP argues that it has "unadjudicated and non-recorded equitable interests" which are wrongfully being foreclosed and sold at sale. Specifically, VP points to language in the unrecorded Third Amended and Restated Real Property Purchase and Sale Agreement dated January 6, 2005 ("PSA") entered into between POBD and North Idaho Resorts, LLC ("NIR"), in which NIR allegedly retained sewer and water rights.

VP's argument is without any basis in law or fact, and has already been adjudicated. As the Court will recall, Valiant filed a motion for summary judgment to establish the priority of the RE Loans, Pensco and MF08 Mortgages over any and all interest claimed by VP in the subject properties. In opposition to the motion for summary judgment, VP continually argued that it had unrecorded, equitable interests in the properties subject to the RE Loans, Pensco and MF08 Mortgages. VP specifically pointed to the PSA and the allegation that it retained the sewer and water rights for the subject property. *See* Memorandum Decision & Order Re: Motions Heard

on October 23, 2015, pp. 8-14. The Court, on summary judgment, expressly rejected VP's arguments. The Court determined that VP had no unrecorded equitable interest in the subject property and determined that the RE Loans Mortgage, Pensco Mortgage and MF08 Mortgage were senior in right, title and interest to any and all interest claim by VP.

Moreover, the language used in the Court's Decree of Foreclosure and complained about by VP was taken directly from the RE Loans, Pensco and MF08 Mortgages, and is a correct statement of the rights and interest which Valiant is entitled to foreclose under those Mortgages.

VP is simply asking the Court to revisit issues which have already been decided on a motion for summary judgment without any new evidence or arguments. VP's arguments are clearly made to delay and hinder the sale of the property subject to Valiant's Mortgages and should be rejected.

**D. The Decree Of Foreclosure Does Not Need To Be Incorporated With The Judgment.**

Finally, VP argues that the Judgment is improper because the Decree of Foreclosure needs to be incorporated into the Judgment under Rule 54(a)(1) of the Idaho Rules of Civil Procedure. This is incorrect. Rule 54(a)(1) provides a "judgment must state the relief to which a party is entitled." In this instance, the Judgment states the relief to which Valiant and JV are entitled. There is no requirement in the Idaho Rules of Civil Procedure or in any other Idaho law that the manner and method of execution and enforcement of the relief set forth in the judgment cannot be separate documents (such as in a decree of foreclosure and order of sale). VP does not cite to a single case or court rule which indicates in any way that the procedure followed by both Valiant and this Court is inappropriate. To the contrary, once a judgment is entered and even after appeal, the district court maintains jurisdiction to issue rulings that can be appealed. I.A.R. 11(7).1

The relief to which Valiant is entitled is set forth in the Judgment, including the priority of its rights over other parties, the amounts it is owed under the notes subject to the Mortgages, and the fact that the properties which are subject to the Mortgages will be sold at a sheriff's sale as issued in a separate document. The procedure followed by Valiant makes the most sense under the Idaho Rules of Civil Procedure, in which the Judgment sets forth the relief and the Decree of Foreclosure sets forth the process by which that relief will be enforced.

**III.**  
**CONCLUSION**

Based upon the foregoing law and argument and the Court's record herein, Valiant respectfully requests the Court to deny VP's Motion to Reconsider and order VP to pay Valiant the attorneys' fees and costs it has incurred in responding to yet another baseless motion that simply repeats issues already decided by this Court.

DATED this 10<sup>th</sup> day of August 2016.

McCONNELL WAGNER SYKES & STACEY <sup>PLLC</sup>

BY:

  
Jeff R. Sykes  
Attorneys For Valiant Idaho, LLC


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10<sup>th</sup> day of August 2016, a true and correct copy of the foregoing document was served by the method indicated below upon the following party(ies):

Gary A. Finney, Esq. Finney Finney & Finney, P.A. 120 East Lake Street, Suite 317 Sandpoint, Idaho 83864 Telephone: 208.263.7712 Facsimile: 208.263.8211 <i>Counsel For J.V., LLC</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Electronic Mail <a href="mailto:garyfinney@finneylaw.net">garyfinney@finneylaw.net</a>
Susan F. Weeks, Esq. James, Vernon & Weeks, PA 1626 Lincoln Way Coeur d'Alene, Idaho 83814 Telephone: 208.667.0683 Facsimile: 208.664.1684 <i>Counsel For VP Incorporated/North Idaho Resorts</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Electronic Mail <a href="mailto:sweeks@jvwlaw.net">sweeks@jvwlaw.net</a>

With two copies via U.S. Mail to:

Honorable Barbara A. Buchanan  
Judge of the First Judicial District  
Bonner County Courthouse  
215 South First Avenue  
Sandpoint, Idaho 83864

  
J. R. Sykes

FIRST JUDICIAL DISTRICT  
2015 AUG 10 AM 10:51 P  
CLERK DISTRICT COURT  
DEPUTY DEPUTY

Richard L. Stacey, ISB #6800  
Jeff R. Sykes, ISB #5058  
Chad M. Nicholson, ISB #7506  
**McCONNELL WAGNER SYKES & STACEY PLLC**  
827 East Park Boulevard, Suite 201  
Boise, Idaho 83712  
Telephone: 208.489.0100  
Facsimile: 208.489.0110  
[stacey@mwsslawyers.com](mailto:stacey@mwsslawyers.com)  
[sykes@mwsslawyers.com](mailto:sykes@mwsslawyers.com)  
[nicholson@mwsslawyers.com](mailto:nicholson@mwsslawyers.com)

Attorneys For Valiant Idaho, LLC

**IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF BONNER**

**GENESIS GOLF BUILDERS, INC.,**  
formerly known as  
**NATIONAL GOLF BUILDERS, INC.,**  
a Nevada corporation,

Plaintiff,

vs.

**PEND OREILLE BONNER  
DEVELOPMENT, LLC,**  
a Nevada limited liability company; *et al.*,

Defendants.

Case No. CV-09-1810

**MOTION FOR SANCTIONS UNDER I.C.  
§ 12-123 AND I.R.C.P. 11**

**Honorable Barbara A. Buchanan**

**AND RELATED COUNTER, CROSS  
AND THIRD PARTY ACTIONS  
PREVIOUSLY FILED HEREIN.**

COMES NOW, Valiant Idaho, LLC ("Valiant"), by and through its attorneys of record, McConnell Wagner Sykes & Stacey PLLC, and, pursuant to I.R.C.P. 11 and I.C. 12-123 moves this Court for an award of attorney fees and costs.

This motion is made and based upon the records and files herein; Valiant Idaho, LLC's Memorandum in Support of Motion for Sanctions Under I.C. § 12-123 and I.R.C.P. 11 Declaration of Richard L. Stacey in Support of Valiant Idaho, LLC's Motion for Sanctions Under I.C. § 12-123 and I.R.C.P. 11 filed concurrently herewith; and any further evidence that may be presented at the hearing of this motion.

DATED this 10<sup>th</sup> day of August 2016.

McCONNELL WAGNER SYKES & STACEY<sup>PLLC</sup>

BY:

  
Chad M. Nicholson  
Attorneys For Valiant Idaho, LLC

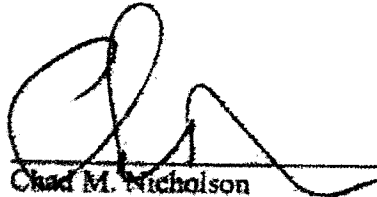
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10<sup>th</sup> day of August 2016, a true and correct copy of the foregoing document was served by the method indicated below upon the following party(ies):

Gary A. Finney, Esq. Finney Finney & Finney, P.A. 120 East Lake Street, Suite 317 Sandpoint, Idaho 83864 Telephone: 208.263.7712 Facsimile: 208.263.8211 <i>Counsel For J.V., LLC</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Electronic Mail <a href="mailto:garyfinney@finneylaw.net">garyfinney@finneylaw.net</a>
Susan P. Weeks, Esq. James, Vernon & Weeks, PA 1626 Lincoln Way Coeur d'Alene, Idaho 83814 Telephone: 208.667.0683 Facsimile: 208.664.1684 <i>Counsel For VP Incorporated/North Idaho Resorts</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Electronic Mail <a href="mailto:sweeks@jvwlaw.net">sweeks@jvwlaw.net</a>

With two copies via United States Mail to:

Honorable Barbara A. Buchanan  
Judge of the First Judicial District  
Bonner County Courthouse  
215 South First Avenue  
Sandpoint, Idaho 83864

  
Chad M. Nicholson