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# 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

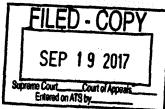
#### CLERK'S RECORD ON APPEAL

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

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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

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STATE OF IDAHO
County of Bonner

FILED HIG 3 20 C

AT 5 O CLOCK O M

CLERK, DISTRICT COURT

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.

AND RELATED COUNTER, CROSS AND THIRD PARTY ACTIONS PREVIOUSLY FILED HEREIN Case No. CV-2009-1810

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

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

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 "It like 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.

08/03/2016 15:32

DATED this 3rd day of August, 2016.

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></u>	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>x</u>	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

FILED 8-3-16

AT 5:00 O'CLOCK M
CLERK. STRICT COURT

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.

AND RELATED COUNTER, CROSS AND THIRD PARTY ACTIONS PREVIOUSLY FILED HEREIN Case No. CV-2009-1810

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

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.

day of August, 2016.

JAMES, VERNON & WEEKS, P.A.

### 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 Juday of August, 2016:

<u>_</u>	U.S. Mail, Postage Prepaid Hand Delivered Facsimile: 208-263-8211	FINNEY FINNEY & FINNEY, PA 120 E Lake St., Ste. 317 Sandpoint, ID 83864
<u> </u>	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

Christine Elmose

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@ivwlaw.net



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.

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

Case No. CV-2009-1810

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

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.

#### 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 – Marshalling: 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>&</sup>lt;sup>1</sup> Valaint'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 Morgagee-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	The second secon	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 Morgagee-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		~~ <b>~~</b>	McCulloch
	Miller	Miller	Miller	Miller	Miller
<b>↓</b> †	Setzer	Setzer	Setzer	Setzer	
Newest	Ball	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 fortyeight and the fifty-seven acres. Why so? Because Setzer had a lien on the fortyeight 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	
Ţ	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, 2 the grouping of parcels and respective liens are depicted as follows:

<sup>&</sup>lt;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	<b>d</b> 1	e	e1	1
Oldest	RE	<u> </u>	RE	-1	<b></b>	RE	RE	
		*****		PEN	PEN	PEN	PEN	
↓ :		MF08	MF08	MF08	MF08	MF08	MF08	T
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 IV 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 or alienation rule to the various mortgages.

These property grouping 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.

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 el, therefore, el 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.

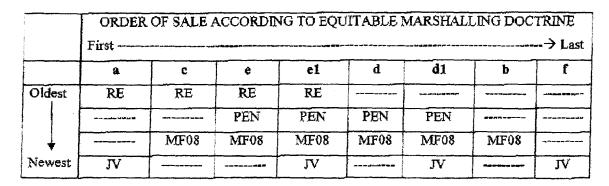
After having sold all of the property encumbered by Pensco, the remaining groupings are b and f, and each is only encumbered by one interest: MF08 and JV respectively. Therefore, there are no marshalling considerations for the sale of each grouping, and no difference whether one is sold before the other.5

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

<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.

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 loss 1 and 2 were the last sold in their respective groupings and lots 159 and 163 were sold first within their respective groupings.

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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

MEMORANDUM IN SUPPORT OF VP INC'S MOTION TO ALTER, AMEND, AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT: 12

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.

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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...

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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 Villelli 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 Villelli ¶ 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. Villelli ¶ 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 PODB 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 day of August, 2016.

JAMES, VERNON & WEEKS, P.A.

Daniel M. Keyes

## CERTIFICATE OF SERVICE

perso	I hereby certify that a true and correctors in the manner indicated this 20 day	t copy of the foregoing was served on the following y of August, 2016:
<u></u>	U.S. Mail, Postage Prepaid Hand Delívered Facsimile: 208-263-8211	Gary A. Finney FINNEY FINNEY & FINNEY, PA 120 E Lake St., Ste. 317 Sandpoint, ID 83864
<u></u>	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
		Christine 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
8.	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, 122-1598, and 1779
f	JV	121

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

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

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

# 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\*).

<sup>\*</sup> 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 mostgages.

STATE OF IDAHO COUNTY OF BONNER FIRST JUDICIAL DISTRICT

2016 AUG -4 PM 1: 22

CLERK DISTRICT COURT

# 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,	, )
	ORDER DENYING VP INC.'s
<b>v.</b>	) REQUEST FOR ORAL ARGUMENT
	ON MOTION TO ALTER,
PEND OREILLE BONNER DEVELOPMENT,	) AMEND AND RECONSIDER
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 4th 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 \_\_\_\_\_ 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

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 stacev@mwasiawyers.com sykes@mwssiawyers.com nicholson@mwssiawvers.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

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION FOR A NEW TRIAL | Page 1 1/1347.201/PLD\Post-Trial/VP New Trial-Opposition 160808.doc

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).

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION FOR A NEW TRIAL | Page 2 1/1547/201/PLDPost-Trial/VP New Trial-Opposition 160808.dog

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 Chub

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 IV 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.

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION FOR A NEW TRIAL | Page 3

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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.

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION FOR A NEW TRIAL | Page 4

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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

IVP's Motion For A New Trial ("Sykes Dec.") are emails to Susan Weeks providing Plaintiff's

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION FOR A NEW TRIAL | Page 5

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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.

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VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION FOR A NEW TRIAL | Page 6 141547.2011/PLDIPOSI-Triaf/VP New Trial-Opposition 160808.duc

DATED this 10th day of August 2016.

McCONNELL WAGNER SYKES & STACEYPLE

BY:

Attorneys For Valiant Idaho, LLC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th 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	[ ✓] U.S. Mail [ ] Hand Delivered [ ✓] Facsimile [ ] Overnight Mail [ ] Electronic Mail paryfinney@finneylaw.net
Counsel For J.V., LLC Susan P. Weeks, Esq. James, Vernon & Weeks, PA 1626 Lincoln Way Coeur d'Alene, Idaho 83814 Telephone: 208.667.0683 Facsimile: 208.664.1684 Counsel For VP Incorporated/North Idaho Resorts	[ ✓] U.S. Mail [ ] Hand Delivered [ ✓] Facsimile [ ] Overnight Mail [ ] Electronic Mail sweeks@ivwlaw.nct

## 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

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FIRE TO 10 P # 03

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
stacev@mwsslawvers.com
sykes@mwsslawvers.com

nicholson@mwsslawvers.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,

٧a.

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
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

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 PORECLOSURE; AND (4) ORDER OF SALE | Pago 1 in/547.2019/LDPon-Triany Alex & Reconsider-Opposition Memo 160809.doc

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 Forcolosure; 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 IV L.L.C.'s Memorandum in Support and Request For Hearing ("Motion to Reconsider").

On August 3, 2016, the Court entered an Order Denving 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.

IJ.

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 IV'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 IV's position. Such is the case with IV'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.

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 | Page 2

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i. 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.

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

VALIANT IDARO, 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 | Page 3 MISAT 20 PPLD Post-TrigIVV After & Reconsider-Opposition Momo 160809 doc

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., IV 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.

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO JV, LL.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 | Page 4

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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, IV's Motion to Reconsider is without any basis in law or fact, and is

completely without merit. IV 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.

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 | Page 5

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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 10th day of August 2016.

McCONNELL WAGNER SYKES & STACEY PLLC

BY:

Attorneys For Valiant Idaho, LLC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th 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 Counsel For J.V., LLC	U.S. Mail Hand Delivered Facsimile Overnight Mail Electronic Mail aryfinney@finneylaw.net
Susan P. Weeks, Esq. James, Vernon & Weeks, PA 1626 Lincoln Way Coeur d'Alene, Idaho 83814 Telephone: 208.667.0683 Facsimile: 208.664.1684 Counsel For VP Incorporated/North Idaho Resorts	[ ✓] U.S. Mail [ ] Hand Delivered [ ✓] Facsimile [ ] Overnight Mail [ ] Electronic Mail sweeks@ivwlaw.net

# 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

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 | Page 7 EVISAT-2011/PLENPORT-THINIV After & Reconsider-Opposition Manno 160809-doc

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@mwsslawvers.com svkes@mwsslawyers.com 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.

DEVELOPMENT, LLC,

PEND OREILLE BONNER

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. Stacev 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"). 1/

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.

To the best of my knowledge and belief, the amounts attributable to each Defendant

or Defendants were properly and fairly allocated.

1/ 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

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.

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 3

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:

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 4

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

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 <u>Exhibits A-D</u> are accurate and in compliance with Rule 54 of the Idaho Rules of Civil Procedure.

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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 I:\1547.201\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 10th day of August 2016.

RICHARD L STACE

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/1547/2017PLD/Pose-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	[ ✓] U.S. Mail [ ] Hand Delivered [ ✓] Facsimile [ ] Overnight Mail [ ] Electronic Mail
Counsel For J.V., LLC	garyfinney@finneylaw.net
Susan P. Weeks, Esq. James, Vernon & Weeks, PA 1626 Lincoln Way Coeur d'Alene, Idaho 83814 Telephone: 208.667.0683 Facsimile: 208.664.1684 Counsel For VP Incorporated/North Idaho Resorts	[ ✓] U.S. Mail [ ] Hand Delivered [ ✓] Facsimile [ ] Overnight Mail [ ] Electronic Mail swecks@jvwlaw.net

## 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

Cha M Mintratage

## EXHIBIT A GENESIS v. POBO Case No. CV 09-1810 All Fees Incurred

Trans Date	Atty	Rate	to Bill	Amount	
09/17/2010	15	<b>\$</b> 140.00	1.1	\$154.00	Review and analyze complaint and mechanic's liten
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	\$192.00	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 Review/analyze documents from P. Ware
09/24/2010	15	\$140,00	0.6	\$84.00	
09/27/2010	15	\$140.00	0.4	\$56.00	Draft substitution of counsel
09/27/2010	15	\$140.00	0.5	\$70.00 \$112.00	Begin drafting discovery  Voicemail to and from E. Davis; voicemail to and from F. Elsaesser
09/29/2010	15	\$140.00	0.8 0.3	\$42.00	Multiple communications with F. Elsaesser
09/30/2010 10/04/2010	15 15	\$140.00 \$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 Contact Ford Elsaesser by phone and email
11/01/2010	15	\$140.00	0.4	\$56.00 \$70.00	Begin draft of answer
11/04/2010	15	\$140.00	0.5	\$266.00	Review proposal letter; review e-mail from P. Ware; review liens
11/10/2010	15	\$140.00	1.9	\$28.00	Follow up by voicemail to Ford Elsaesser
11/11/2010	15	\$140.00	0.2 0.4	\$56.00	Multiple communications with little company regarding other
11/12/2010	15	\$140.00	0.4	\$112.00	mechanic's flens ancumbering property  Multiple communications with P. Ware regarding proposed settlement
11/16/2010	15	\$140.00 \$140.00	0.9	\$126.00	from buyer Review and analyze new action naming R.E. Loans as defendant
11/29/2010 12/13/2010	15 15	\$140.00 \$140.00	0.4	\$56.00	Phone conference with P. Ware regarding new lawsuit and Fidelity claims
404000010	15	\$140.00	0,2	\$28.00	Review letter from Finney
12/13/2010 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	Ω.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 Telephone conference with P. Ware
01/13/2011	3	\$250.00	0.2	\$50,00 \$75,00	Telephone conference with Alfiance Title regarding condition of title
01/14/2011	3	\$250.00	0,3	\$10.00	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
04.000.0004.4	3	\$250.00	0.3	\$75.00	Telephone conference with B. Coe
01/26/2011 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 3. Oce
01/31/2011	3	\$250.00	0.3	\$75,00	E-mails to Alliance regarding copies of lien and release for ACI
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	documents
02/01/2011	3	\$250,00	0.2	\$50.00	E-mail to B. Coe with schedule of documents Review/analyze ACI cross claim to Genesis Golf Builders' complaint
02/03/2011	3	\$250.00	0.5	\$125.00	Draft/revise reply to cross claim
02/03/2011	3	\$250.00	1	\$250.00 \$125.00	Edit repty to crossclaim
02/04/2011	3	\$250.00	0.5	\$50.00	Phone conference with B. Coe
02/11/2011	3	\$250.00	0.2 1.6	\$272.00	Analyze file documents regarding ACI
04/11/2011	10	\$170.00	0.6	\$102.00	Analyze litigation strategy
04/11/2011	10	\$170,00 \$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 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
04/13/2011	10	\$170.00	1	\$170.00	Outline answer to Genesis Builders' complaint
04/14/2011 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	Oulline 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
04/18/2011	10	\$170.00	0.8	\$136,00	Analyze/edit/finalize answer
04/18/2011	10	\$170.00	1.6	\$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
	19	\$110.00	5.1	\$561.00	Research regarding constructive trust
04/22/2011	19	\$110.00	2	\$220.00	Review/analyze mortgages, deeds of trusts, and other lien documents
04/25/2011			1.9	\$209.00	Research priority dates
04/25/2011	19	\$110.00	1.5	\$165.00	Research regarding agency
04/26/2011	19	\$110.00			Analyze email from client
04/26/2011	10	\$170.00	0.2	\$34.00	
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
0412012011		• /			POBD
04/00/0011	10	\$170.00	1.6	\$272.00	Oraft/analyze/edit motion to consolidate and supporting memorandum
04/26/2011		\$110.00	2	\$220.00	Draft memorandum regarding agency
04/27/2011	19			\$102.00	Draft/analyze affidavit in support of memorandum in support of motion
04/27/2011	10	\$170,00	0.6	\$102.00	lo consolidate
				****	
04/27/2011	10	\$170,00	0.2	\$34.00	Draft/analyze motion to consolidate
04/27/2011	10	\$170.00	0.3		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 lian 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
	10	\$170.00	0.3	\$51.00	Analyze letter from opposing counsel regarding motion to consolidate
04/28/2011			0.2	\$34.00	Telephone conference with client
04/28/2011	10	\$170.00		\$170.00	
04/29/2011	10	\$170.00	1		Analyze amail from Fideilty regarding RC Worst claim
04/29/2011	10	\$170.00	0.2		
04/29/2011	10	\$170.00	1,1		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
GO! GO! LO .		•			remedies at law
acine ions	19	\$110.00	3.1	\$341.00	Research regarding constructive trusts and unjust enrichment
05/06/2011			2,5	\$275.00	Draft/revise memorandum regarding constructive trusts
05/06/2011	19	\$110.00		\$34.00	Analyze email from California counsel for R.E. Loans
05/09/2011	10	\$170.00	0.2		Email Idaho counsel for R.E. Loans regarding contact person to
05/09/2011	10	\$170.00	0.1	\$17,00	
					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; small to Fidelity re-same
05/10/2011	10	\$170.08	0.2	334.00	Telephone conference with Fidelity
05/11/2011	3	\$250.00	0,4	\$100.00	Telephone conference with P. Ware, local counsel for RE loans
	19	\$110.00	0.4	\$44.00	Analyze consolidation pleadings
05/12/2011			1.7		Research regarding consolidation and equitable subrogation
05/13/2011	19	\$110.00		\$77.00	Review/analyze pleadings in all three cases
95/13/2011	19	\$110.00	0.7		
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	9.8	\$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
Q3F : 1120 T	,,,	4,,4.50	-14	,	regarding the same
	40	\$170.00	0,3	\$51.00	Analyze proposed changes to confidentiality agreement
05/17/2011	10			\$51.00	Prepare argument in support of motion to consolidate
05/17/2011	10	\$170.00	0.3		Review memo in support of motion to consolidate, memo in opposition
05/18/2011	3	\$250.00	1.5	\$375.00	Review (right) is support of insects to sometime to connected
					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
	10	\$170,00	1-2	\$204.00	Analyze client documents
05/25/2011		\$170.00	0.3	\$51.00	Analyze Motion to Withdraw from counsel for POBD
05/26/2011	10			\$672.00	Prepare answer to Worst cross-claim
06/01/2011	6	\$210.00	3.2		Prepare interrogatories and requests for production to RC Worst
06/02/2011	5	\$210.00	4.4	\$924.00	
				tore er	Company, Inc.
06/03/2011	6	\$210.00	1.2		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	Talephone conference with P. Ware regarding liens and mortgagesr
06/07/2011	10	\$170.00	1.3		Analyze R.E. Loan documents
06/07/2011	10	\$170.00	0,8		Analyze/amend discovery to ACI
	10	\$170,00	0.6		Analyze/edit discovery to ACI
06/08/2011 06/09/2011	10	\$170.00	0.5	\$102,00	Finalize discovery to ACI
	10	\$170.00	2	\$340,00	Analyze documents from title company
06/09/2011			0.3	\$136.00	Analyze proposed stipulation regarding claims of Wells Fargo; email
06/22/2011	10	\$170.00	0.0	\$ (50.00	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	1Q	\$170.00	1,3	\$306.00	Analyze documents recorded against the Idaho Club Property
06/26/2011	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
	10	\$170.00	1		Analyze RC Worst lien
06/30/2011	10	\$170.00	1,6		Research lien priority issues
06/30/2011				\$459.00	Analyze liens, andorsements of payments on accounts; its pendens:
07/06/2011	10	\$170.00	2.7	₩903.00	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, andorsements of
07/06/2011	10	\$170.00	1.4	\$238.00	

					other documents recorded against the Idano 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
			2.2	\$63.00	Correspondence to C. Dodson regarding defendant's claim
08/03/2011	5	\$210.00	0.3 Q.4	\$68.00	Telephone conference with J. Finney (2) regarding propriety of Finney
08/16/2011	10	\$170.00	Q.4	200.00	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	9.4	\$68.00	Draft letter to Mr. Ng requesting agreement to service by email and
30723723		•			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 compe
08/23/2011	10	\$170.00	0.9	\$153.00	Analyze property records relating to April 15, 2008, partial release of
				** ***	Morfgage
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 0.2	\$102,00 \$34.00	Analyze property records Email litle company regarding Parcel 21
08/24/2011	10	\$170.00	0.4	\$66,00	Analyze colorized plats from title company
08/24/2011	10 10	\$170.00 \$170.00	0.1	\$17.00	Analyze email from opposing counsel for Mortgage Fund 08 regarding
08/30/2011	10	a.,,o.oc	<b>3.</b> ,	• , , , , , ,	stipulation as to Wells Fargo
08/30/2011	10	\$170.00	0.4	\$68.00	Analyze draft stipulation and proposed changes from ACI counsel
00:00:20		•			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	3.4	\$68.00	Email client regarding project documents
08/31/2011	10	\$170.00	0.1	\$17.00	Analyze voicemail from counsel for Weils Fargo
08/31/2011	10	\$170.00	0.2	\$34.00	Analyze draft new stipulation
08/31/2011	^0	\$170.00	0.1	\$17.00	Leave voicemail for said counsel outlining additional objections to
				##4.DC	stiputation Telephone conference with P. Ware regarding discovery issues with
09/01/2011	10	\$170.00	0.3	\$51.00	ACI and objections to Wells Fargo stipulation
		2470.00	1.8	\$306.00	Analyze needed discovery; analyze real property records;
09/01/2011	10	\$170.00	1.0	9000.00	confer with client
20/07/2044	40	\$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
09/07/2011	10	9 · 10.90	0,,0	4.00.00	for production of documents
09/07/2011	10	\$170.00	0.6	\$102.00	Outline deficiencies in RC Worst interrogatory answers and responses
09/07/2011	10	φ (19.00	0.0	*	to requests for production of documents
09/07/2011	10	\$170.00	0.4	\$68.00	Telephone conference with opposing counsel regarding deficiencies in
95107125		*******			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
				2/2/20	discovery responses
09/09/2011	10	\$170.00	0.1	\$17.00	Leave voicemail for counsel for RC Worst regarding deficiencies in
		*/== ==	2.1	\$68,00	discovery responses Analyze/outline RC Worst discovery discrepancies
09/13/2011	10	\$179.00	0.4 0.1	\$17,00	Telephone conference (leave voicemail) with counsel for RC Worst
09/13/2011	10	\$170.00	u,;	917,00	regarding deficiencies in discovery responses
09/13/2011	10	\$170.00	0.1	\$17,00	Telephone conference (leave voicemail) with counsel for Genesis
081 (3/20)	10	# 17 0.00	317		Builders regarding outstanding discovery responses
09/13/2011	10	\$170.00	1.9	\$323.00	Draft/analyze/edit motion to compet ACI discovery responses to R.E.
30110:2011		*********			Loans' discovery and affidavit in support of same
09/14/2011	10	\$170.00	1.8	\$272.00	Analyza/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 cultining discovery
20/40/52:	10	2470.00	0.1	\$17.00	discrepancies  Analyze email from opposing counsel regarding alleged bankruptcy of
09/19/2011	10	\$170,00	0.1	g 17.000	R.E. Loans
an interpretat	10	\$170,00	0.7	\$119.00	Analyze bankruptcy petition and letters attached thereto
09/19/2011	10	\$170.00 \$170.00	0.4		Analyze impact of bankruptcy on litigation
09/19/2011 09/19/2011	10	\$170,00	0.6	\$102,00	Analyze/draft/finalize letter to counsel for RC Worst outlining
09/19/2017	10	\$110,00	3.5	7.72,00	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
20.20.20					discovery responses
09/26/2011	10	\$170.00	0.3	\$51.00	Email client regarding alleged bankruptcy filling; analyze reply to same
09/29/2011	19	\$110,00	2.2	\$242.00	Research whether a defendant/bankrupt's motion to compet is stayed
				A46	by the automatic stay
09/29/2011	10	\$170.00	0.8	\$136.00	Analyze pleadings filed by ACI regarding notifying of bankruptcy filing:
			2.7	too oc	analyze objection to motion to set aside default
09/30/2011	19	\$110.00	0.6	\$66.00	Analyze complaint, answer, first set of discovery, motion to compel in
	46	4470.00	0.4	817.00	preparation for hearing on motion to compel  Analyze voicemail from counsel for client and return call to same
09/30/2011	10	\$170,00	0.1	\$17.00 \$34.00	Analyze order staying proceedings due to bankruptcy
10/03/2011	10	\$170.00	0,2	\$34.00 \$238.00	Legal research regarding manner of lifting bankruptcy stay
10/03/2011	10	\$170.00	1.4 0.3	\$51.00	Analyze pleadings filed by ACI
10/04/2011	10 10	\$170,00 \$170.00	0.2	\$34.00	Analyze letter from C. Dodson regarding R.C. Warst discovery
10/04/2011	10	9:70.90	S. S. San	40 200	• • • • • • • • • • • • • • • • • • • •

					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	\$179.00	2.6	5442.00	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 effect 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 bankrupley filing, status of motion to lift stay, and current status of idano Club fitigation.
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  Analyze bankruptcy rules and Idaho law regarding nonjudicial
10/21/2011	10	\$170,00	1.8	\$306.00	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 forectosure 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  Analyze RC Worst documents
11/01/2011	10	\$170.00	2.1 0.4	\$357.00 \$68.00	Email client regarding nonjudicial foreclosure
11/02/2011	10 10	\$170.00 \$170.00	0,1	\$17,00	Analyze client's response
11/02/2011 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	Analyza 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	6.0	\$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 ilens Correspondence with tax assessor notifying of bankruptcy stay
11/04/2011	10	\$170.00	0,2 0,2	\$34.00 \$34.00	Analyze pleading from B. Ng
11/05/2011	10 10	\$170.00 \$170.00	0.1	\$17.00	Analyze voicemail from 3. Ng
11/14/2011	10	\$170.00	0.2	\$34.00	Telephone conference with B. Ng regarding motion to set aside and
11/14/2011	10	#110.00	y. <b>L</b>	******	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	\$170.6 <b>0</b>	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 Analyze email from Fidelity regarding status
12/06/2011	10	\$170,00	0,3	\$51.00 \$182.00	Prepare for and attend hearing
12/15/2011	15	\$140.00	1,3 2,6	\$364 <sub>-</sub> 00	Review/analyze documents regarding casemap
12/28/2011	15 19	\$140.00 \$110.00	0.6	\$66.00	Attend telephonic hearing regarding motion to withdraw;
12/29/2011					conference with R. Stacey regarding the same
01/03/2012	15	\$140.00	4.9	\$686.00 \$798.00	Lien analysis; review and organize documents  Continue lien analysis; review and organize documents
01/04/2012	15	\$140,00 \$140.00	5.7 2.9	\$406,00	Draft lien analysis; review and organize documents
01/05/2012	15 15	\$140.00	4,3	\$602.00	Revise ilen analysis; review and organize documents and facts into
01/06/2012					Casemap
01/06/2012	10	\$170.00	0.7	\$119.00 \$153.00	Analyze RC Worst and Sage Holdings documents  Draft outline of deficiencies in documents
01/06/2012	10	\$170.00	0.9	\$153.00 \$51.00	Analyze email from client and respond to same
01/09/2012	10	\$170.00	0.3 0.2	\$34.00	Email Fidelity regarding memorandum regarding priority
01/09/2012	10 10	\$170.00	0.2	\$34.00	
01/09/2012 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.
01/16/2012	15	\$140.00	0.6	\$84.00	Loans; participate in conference call 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	Analyza 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	9.3	\$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
01/20/2012	15	\$140.00	0.5	\$70.00	Multiple communications with R, Laws Email client regarding status of bankruptcy stay; analyze response;
01/20/2012	10	\$170.00	0.5	\$85.00	reply to same
01/20/2012	10	\$170.00	0.3	\$51,00 \$69,00	Analyze email from client; respond to same  Analyze email from bankruptcy counsel and analyze/reply to same
01/20/2012	10	\$170.00	0.4	\$68.00	Ministry and in the partie of the sound of the analytic training and analytic training to a settle

01/23/2012	10	\$170.00	0.6	\$102.00	Analyze Wells Fargo's motion to dismiss based upon Genesis' (alture to obtain new counsel
01/27/2012	10	\$170.00	0.9	\$153.00	
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 amails 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 little 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	
01/30/2012	70	\$170.00	0.2	\$34.00	
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	9.5	\$70,00	
02/08/2012	10	\$170.00	0.3	\$51.00	
62/08/2012	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	
02/10/2012	10	\$170.00	0.3	\$51.00	Analyze email from client and respond to same
02/14/2012	10	\$170.00	9.3	351,00	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 counset regarding status of bankruptcy stay and whether R.S. Loans intends to file a motion to fift the stay
03/02/2012	10	\$170.00	0.3	\$51.00	Telephone conference with R. Dishnics regarding R.E. Loans'
garazizu IZ	30	9119.00	y	JU 1.00	correspondence with Bar-K
03/02/2012	10	\$170.00	0.3	\$136,00	Analyze client documents and forward same to R. Distinica
		\$170.00	1.2	\$204.00	Analyze pleadings forwarded by client
03/06/2012	10 10	\$170.00	0.4	\$68.00	Telephone conference with silent
03/06/2012		\$190.00	1,1	\$209.00	Review and revise Motion for Relief from Stay
03/06/2012	15		0.3	\$75.00	Analyze emails from CA counsel and confer with A. Eberlin regarding
03/12/2012	10	\$250.00	V.3	\$25.00	
		A100.00	4 ~	2022.00	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 ifft stay; confer with A. Eberlin regarding the same; analyze email from R. Districia and respond to same
2014 4 (0.04)	45	\$100.00	4.2	\$798.00	Revise bankruptcy motion for stay relief; research regarding tax deeds
03/14/2012	15	\$190.00	7.2	Ç, 30.00	and bankrupicy
20/45/2042	10	\$250.00	1.4	\$350.00	Prepare for conference call; participate in conference call with R.
03/15/2012	10	\$250,00	€ <del>.14</del>	#330.00	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
					Ireasurer 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. Distinica 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. Dishrica 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 Sonner County; phone conference with client
03/21/2012	10	\$250.00	0.7	<b>\$</b> 17 <b>5.</b> 00	Analyze/edit motion to lift stay and confer with A. Eberlin 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 Borner County; analyze draff letter to Borner 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; emailyze emails from client; email clients
03/26/2012 03/28/2012	15 15	\$190.00 \$190.00	0.4 1.2	\$76,00 \$228.00	Revise Notice of Pending Issue of Tax Deeds and 2008 payoff Multiple communications with E. Karasik; review notices from Bonner County; 'farit's-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. Distinica 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:
<b>3</b>					multiple communications with co-counsel, client, G, Edson, and J. Rogers (Courtesy Discount)
04/03/2012	10	\$250.00	0.7	<b>\$</b> 175.00	Analyze final draft motion for contempt; small client regarding the same; analyze smalls from client and co-counsel regarding the same
2.000.0040	45	\$140.00	1.1	\$154.00	Review and organize documents
04/03/2012 04/04/2012	15 15	\$190.00	2.1	\$399.00	Strategy meeting with R. Stacey; review letter from G. Edson; research
(4)(4)2012		<b>\$</b> 100.00	_, .		regarding optential relief from stay motion (Courtesy Discount)
04/04/2012	10	\$250.00	0.9	\$225.00	Analyze amail 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  Analyze billing statements and confer with A. Eberlin regarding the
04/06/2012	10	\$250.00	0.8	\$150,00	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  Analyze emails from E. Karasik and J. Holley; respond to same
04/11/2012	10	\$250.00	0.3	\$75.00	Review e-mail from E. Karasik and review fees
04/11/2012	15	\$190.00	0.4	\$75.00	Continue to analyze project documents
04/12/2012	15	\$140.00	3.6	\$504.00 \$76.00	Review e-mails from E. Karasik and G. Edson
04/13/2012	15	\$190,00	0,4 3.5	\$665.00	Review e-mails to and from Dishnica; research PUD and public works
04/16/2012	15	\$190.00			process
04/16/2012	10	\$250.00	0.6	\$150.00	Analyze emeils 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 small 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
3 1401-401-					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	8.0	\$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	1,5	\$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	0,6	\$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
30,20,20					same
06/28/2012 06/29/2012	15 10	\$190.00 \$250.00	0.6 0,2	\$114,00 \$50.00	Finalize and file motions  Analyze emails from R. Dishnica and E. Karasik regarding motion to lift
	10	\$170.0B	0.3	\$51.00	stay Analyze order from court
07/02/2012 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 amail 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/egarding the same
07/19/2012	10	\$170.00	2.7	\$459.00	Analyze pleadings in bankruptcy court (order confirming bankruptcy reorganizational plan, court's memorandrum decision and findings of fact approving reorganizational plan; chapter 11 reorganization plan;
07/19/2012	10	\$170.00	0.6	\$102.00	
07/20/2012	10	\$170.00	0.2	\$34.00	
07/20/2012	10	\$250.00	0,3	\$75.00	
07/26/2012	10	\$250.00	5.1	\$1,525.00	
					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	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 client regarding status of motion to lift stay in Mortgage Fund 98 bankruptcy
08/06/2012	10	\$170.00	0.5	\$85.00	Analyze pleadings filed by Interstate Concrete
08/07/2012	10	\$170.00	S. 6	\$102,00	Oraft/analyze/edit proposed order lifting automatic stay and letter to
00/00/0040	40	#050.00		80F 20	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
08/09/2012	10	\$170.00	0.6	\$102.00	call; attend conference call with J. Holley and R. Dishnica Draft email to Fidelity updating status of case
08/13/2012	10	\$250.00	0.3	\$75.00	
08/16/2012	10	\$170.00	0.2	\$34.00	analyze pleadings filed by coursel for Mortgage Fund 08
08/23/2012	10	\$170.00	0.3	\$51.00	Analyze amail from opposing counsel regarding status of orders lifting automatic stay; respond to same
08/28/2012	10	\$250.00	1.8	\$450.00	Analyze complaints filed in Pacific Capital, ITD, HOA and North Idaho Resorts cases; analyze/compare legal descriptions attached to same
98/30/2012	10	\$250.00	2.9	\$725.00	Analyze complaints and legals and amail title company regarding the same; analyze title company response; analyze/draft amail to title company requesting additional information; analyze/draft amail counsel for North Idaho Resorts; analyze response from same; traft reply
08/31/2012	10	\$170.06	0.8	\$136.00	Analyze pleadings filed by opposing counsel
09/16/2012	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 small same to him
09/24/2012	10	\$250.00	0.6	\$150.00	Analyze amail and attachments from title company regarding Trestle Creek property
10/03/2012	10	\$250,00	1,9	\$475,90	Analyze voicemait from J. Krause; analyze emait and traft stipulation from J. Krause; analyze/compile list of cases with MF08 as a defendant; email same to J. Krause; analyze emaits from J. Krause regarding MF08 cases; analyze ACI claims and respond to same; analyze emait from J. Krause and confirm accuracy of draft Exhibit A and stipulation attaching same
10/08/2012	10	\$250,00	0.7		Email J. Krause regerding status of stipulation; analyze response from J. Krause and reply to same; analyze draft stipulation and email him regerding the same
10/11/2012	10	\$250.00	0.6		Analyze draft stipulations from J. Krause and amails 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 plats and other documents
10/28/2012	15	\$190.00	1.2	\$228.00	File review
11/01/2012	15	\$190.00			No charge: Review of Plainter's discovery responses to Bar-K; First
11/12/2012	10	\$250.00	0.6	\$150.00	interrogatories and requests for production responses  Email client regarding status of Mortgage Fund 18 bankruptoy; analyze response to same; raphy to same regarding scheduling conference call
14/00/2012	10	\$350.00	a.c	2450.00	Ornegra for interesting with diget and the triangle of
<b>11/20/2012</b> 12/10 <b>/20</b> 12	10 15	<b>\$250.00</b> \$190.00	<b>9.6</b> 0.9		Prepare for teleconference with client; participate in teleconference call
01/08/2013	10	\$190.00	0.4		Review property records; e-mail to R. Mollerup Email Fidelity regarding status of MF08 bankruptcy
01/08/2013	10	\$170.00 \$170.00	0.4		Email Fidelity regarding status of Mr-Us bankruptcy Analyze email from client
01/15/2013	10	\$250.00	0.2		Draft notice to appear telephonically
01/28/2013	10	\$170.00	0.3 0.1		Prepare for teleconference call with client
COLUMN TO	14		<b>9.</b> /	y.r,500 )	. There are supporting and title oligit

01/28/2013	10	\$170.00	0.2	\$34.00	Telephone conference with client
01/28/2013	10	\$170.00	0.2	\$34.00	
01/30/2013 03/04/2013	10 10	\$170.00 \$250.00	0.2 0.4	\$34.00 \$100.00	
				****	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 effects of same; analyze draft motion to
					stay
03/15/2013	10	\$250.00	0.2	\$50.00	
					benimptoy stay
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erept a nord					
1899972(k) ()		A 1777 TO 174 TO 1		(1) マネカで作	
03/25/2013	10	\$250.00	2.8	\$700.00	Orafi/analyza/edit email to Fidelity; analyze RE Loans documents; analyze Fidelity response; email J. Holley
174.44		Switch Control			
04/01/2013	10	\$250,00	0.2	\$50.00	Analyze letter and emails from F. Deltan to Fidelity
04/01/2013		3250.00		330.00	
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 amail from S. Vogt and respond to same
04/12/2013 04/12/2013	10 10	\$170.00 \$170.00	0.2 0.7	\$34.00 \$119.00	Analyze amail from client Review subordination agreement and breach of same
04/12/2013	10	\$170.00	0.2	\$34.00	Email client
04/12/2013	10	\$250.00	0.6	\$150.00	Analyze letter from Fidelity; email client regarding the same
As her real	7.1	\$250.00		J133.00	는 사람들이 가장 보다 되었다. 그 없는 사람들은 사람들이 되었다면 보다 되었다. 그 사람들이 다른 사람들이 되었다. 그 사람들이 되었다면 보다 되었다면
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04/18/2013	10	\$170.00	0.2	\$34.60	Analyze email from <b>Pidality and respond</b> to same
94/18/2013	10	\$170.00	0.3	351.00	Email RE Loans regarding. Ridelity email and analyza/respond to same
STEER STATE				7.7.17.	
19 95200					
77.72					
7 (F)					
NAMES OF THE					
	راند. المستقدار الأراثية	S			
04/23/2013	10	\$170.00	2.1	\$357.00	Analyze property records to identify appropriate legal description of
0.272.772	100		[5] (1,52) <del>[6]</del> (4,14) (1,15)		Tresile Creek property
BONGER TO					
et events					
and the second s				2 Mars 17 7 2	
05/08/2013	10	\$170.00	3.4	\$68.00	Telephone conference with R. Lynskey regarding expert testimony
05/08/2013	10	\$170.00	9.3	\$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	9.2	\$50.00	Email R. Lynskey regarding legal description
05/14/2013 05/14/2013	10 10	\$170.00 \$170.00	1 0.3	\$170.00 \$51.00	Analyze/draft/edit expert witness disclosure Analyze documents in support of expert witness disclosure
05/15/2013	10	\$170.00	2,6	\$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	•
06/06/2013	10	\$170.00	0.9	\$153.00	
06/12/2013	10	\$250.00	1.3	\$325.00	
06/17/2013	10 10	\$250.00	1.2	\$300.00	
06/18/2013 06/20/2013	10	\$170,00 \$250.00	0,2 9,3	\$34.00 \$75.00	
06/24/2013	10	\$250.00	2.1	\$525.00	stay
					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	
96/26/2913	10	\$170,00	0.9	\$153.00	
	10	\$250.00	1.3	\$325.00	Prepare for and aftend hearings on motions to lift stay; (septions
07/29/2013	10	\$230,90	1,3	#J20.00	conference with opposing coursel regarding hearings on motions to lift stay.
07/29/2013	15	\$190.00	0.2	\$38.00	
07/30/2013	10	\$250,00	0.6	\$150.00	
08/05/2013	19	\$180,00	4	\$180,00	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	5190.00	0.7	\$133.00	Deposition preparation for deposition of R. Villetti
08/12/2013	10	\$170.00	1,9	\$323.00	
08/12/2013	10	\$170.00	0.9	\$153.00	
08/12/2013	10	\$170.00	0.4	\$68.00	
08/13/2013	10	\$179.00	0.6	\$102.00	Analyze documents in preparation for conference call with client
08/13/2013	10	\$170.00 \$170.00	0,4 0,4	\$68.00	Telephone conference with J. Holley regarding trial documents
08/13/2013 08/14/2013	10 10	\$170.00	0.6	\$68.00 \$102.00	Telephone conference with R. Dishnica and J. Holley  Analyze opposition to motion for summary judgment
08/18/2013	15	\$190.00	0.3	\$57,00	Draft NIR stipulation and disclaimer of interest:
	100				
e destruit de la companya de la comp		Of the second			
40/00/0043			3.2	6100.02	
10/08/2013 10/08/2013	<b>10</b> : 10	\$170.00 \$170.00	0,6 0,2	\$102.00 \$34.00	Email K. Ng and other former RE Loans amployees  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	\$179.00	2.9	\$493,00	Cultine 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
10/31/2013	10	<b>\$</b> 170.00	0.8	\$102.00	to the same 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 amail 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. 63-1001 et seg.
11/22/2013	5	\$245.00	3.1	\$759.50	Prepare tax deed analysis memorandum and include LC. 31-808
11/25/2013	5	\$245.00	0.4	\$98.00	Telephone conference with L. Cell 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);
10/20/00/0	_	20.45.00	2.2	£40.20	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 amail to counsel for liquidating trustee in Mortgage Fund 08
					pankruptch
12/05/2013	19	\$180.00	1	\$180.00	Analyze Idaho lax code regarding redemptions; shepardize redemption
10:00:0010	_	## 15 00	4.0	# inc en	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 5/15/07 loan policy of use insurance; review 5/11/13 illle commitment
12/11/2013	5	\$245.00	0,5	\$122.50	E-mail to J. Hollev and R. Dishnica
12/18/2013	5	\$245.00	0,9		Prepare for and participate in conference call with R. Dishnica and J.
					Holley
12/23/2013	10	\$170,00	1.9		Analyze electronic documents produced by POBD
12/23/2013	10	\$170.00	0.2		Email counsel for POBD regarding status of discovery document hard
01/02/2014	10	\$250,00	2.1		copies Analyze amails from J. Krause (2) and draft/analyze responses to the
0 170222014	,,,	4200,00	<b>L.</b> ,		same; confer with J. Krause regarding bankruptcy information
					requested by court; analyze amails 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;
04 103 1004 4	10	<i>ຂ</i> ອຍກ ກາ	4.4		analyze email from J. Krause regarding the same
01/03/2014	10	\$250.00	1.1		Analyze draft pleadings and affidavit; confer with C. Nicholson regarding same via teleconference
01/08/2014	10	\$250,00	2.5		Prepare for and participate at hearing regarding bankruptcy stay and
					= + 1 + 1 + 1 + 1 + 1 + 1 + 1 + 1 + 1 +

01/10/2014 01/15/2014	10 10	\$250.00 \$250,00	0.6 0.4	\$150.00 \$100.00	7 Telephone conference with J. Krause regarding hearing requesting bankruptcy clarification; compile requested documentation and amail same to J. Krause
11-12.00					
					n de financia de la companya de la c La companya de la co
12/07/2012 (2.4		72 . J			
02/17/2014	10	\$250.00	2.9	\$725.00	Analyza documents from C. Reeves and RE Loans documents
02/25/2014 03/03/2014	3 3	\$300.00 \$300.00	1.5 1.2	\$450.00 \$360.00	
03/03/2014	10	\$250.00	0.3	\$75.00	Telephone conference with M. Brennan regarding status of case and
03/04/2014	10	\$250.00	0.2	\$50.00	confer with D. Mollerup regarding the same  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
03/05/2014	3	\$300.00	1.4	\$420.00	Bonner County Treasurer; telephone conference with M. Brennan. Review Notices of Tax Sale; telephone conference with G. Edson, attorney for the County; review procedure for tax sales; telephone
03/05/2014	10	\$250.00	0.5	\$125.00	conference with Bornar County Treasurer; email J. Krause 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 laxes 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	<b>\$2</b> 75.00	Confer with D. Mollerup; leave volcemail for J. Holley; telephone conference with M. Brennan; confer with
03/07/2014	10	\$250.00	0.3	\$75.00	Holleran regarding tax deed, redemption issues and research     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
03/10/2014	3	\$300.00	4.5	\$1,380.00	status; attend teleconference; research bankruptcy filings Telephone conference with R Distinica, 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. Pfehl, County Treasurer
03/11/2014	3	\$306.00	4.5	\$1,350.00	Telephone conference with R. Linskey at First American; multiple telephone conferences with C. Pfehl;
03/10/2014	10	\$250.00	0.2	\$50.00	review schedule of taxes; email R, District and M, Brennan 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
				V. 1611	
03/11/2014	10	\$250.00	1.3	\$75.00	Analyze pleadings filed by apposing counsel
				26 St. 14.15	
03/12/2014	3	\$300.00	0,5	\$150:00	Review plats
03/13/2014 03/14/2014	3 10	\$300.00 \$250.00	0,5 0.3		E-mail to M. Brennan and R. Dishnica 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	5.8	\$1,400.00	Analyze documents from J. Holley and C. Reeves
03/18/2014	10	\$250.00	4.9		Analyze project documents
03/19/2014	10	\$250.00	5.8		Continue to analyze documents
03/20/2014	10	\$250.00	5.4		Continue to analyze documents
03/20/2014	10	\$250.00	0.3		Analyze pleadings filed by POBD
03/25/2014 04/01/2014	3 10	\$300.00 \$250.00	0,2 3.9		Telephone conference with G. Edson  Analyze email and attachments from M. Brennan; confer with D.
04/01/2014	3	\$300.00	4	\$1,200.00	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 Review tax information received from M. Brennan; telephone conference with RE Loans; telephone conference with RE Loans; telephone conference with RE Loans; telephone conference with RE. Lynsky at
					First American; telephone conference with A. Knight;
DAIDSISSA4	10	รวรก กก	2.9		email to M. Brennan; telephone conference with client Analyze project documents
04/02/2014 04/03/2014	10	\$250.00 \$250.00	2.5		Analyze project documents Continue to analyze project documents
04/04/2014	10	\$250.00	0.9	\$225.00	Analyze Trestle Creek appraisal and small R. Dishnical 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 (ax deed; research redemption deed; research county deed
04/07/2014	19	\$190.00	5.8	\$1,102.00	
	_	*****		****	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. McLaughtin
					regarding HOA plans to pay taxes and issues related to the same
04/07/2014	10	\$250.00	1.6	\$400.00	
					Company of the second s
<b>04/08/2014</b> 04/08/2014	1 <b>0</b> 10	\$250.00 \$250.00	0.8 1.1	\$150.00 \$275.00	
04/08/2014	19	\$190,00	5.6	\$1,064.00	
04/08/2014	3	\$300.00	0,7	\$210.00	
04/09/2014	19	\$190.00	2	\$380.00	
04/09/2014	3	\$300.00	1.5	\$450.00	Review process of tax deed and sate 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	1.6	\$400.00	Complete analyzing/drafting/editing memorandum; email
					client regarding telephone call to discuss matter; email client
04/11/2014	10	\$250.00	2.1	\$525.00	memorandum 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 amail from opposing counsel regarding C. Reeves deposition
					and respond to the same
04/14/2014	10	\$250.00	0.2	\$50,00	Analyza response from opposing counsel regarding C. Reeves
04/14/2014	10	\$250.00	0.3	\$75,06	deposition Telephone conference with opposing counsel regarding possibility of
5-17-7-2-5-1-1		4200.00		4, 5,120	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
04/14/2014	19	\$190.00	3.1	\$589.00	regarding modifications to memo based upon the same Teleconference with client; research
947 (4)20 (4	10	\$1.00.90	<b></b>	4000.00	super-priority "tax lien"; draft/revise memo
04/14/2014	3	\$300.00	0.5	\$150.00	Telephone conference with M Brennon
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
100000					
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.
, A. P. J.	(1.6	221.1			
		ng-			
04/17/2014	15	\$190.00	4.3	\$8:17.00	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. Moilerup 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 small from F. Elsaesser; small R. Dishnica regarding the
STORY STATE		74 W. 1	er site		same; analyze his response; analyze/draft/soft mamorandum to cilent
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 04/21/2014	15 10	\$190.00 \$250.00	3 1.9	\$570.00 \$475.00	Continue research regarding motion for summary judgment against ACI 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 compet;
					outline motion for summary judgment against the HOA; email clients
04/22/2014	10	\$250.00	3.1	\$775.00	regarding teleconference call  Analyze/draft/ed/it memorandum of law to client;
34:2020,4		3200.00	•	47.000	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. Molterup, R.
04/22/2014	10	\$250.00	1.4	\$350.00	Dishnica, M. Brennan, J. Holley, G. Hendersen Analyze/draft/edit F. Dakan affidavít
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		Analyze documents and draft/analyze/edit affidavit of F. Dakan
04/22/2014	15 10	\$190.00 \$250.00	2,2 0,2		Continue drafting memorandum supporting summary judgment against ACI  Analyze emails from client
04/23/2014 04/23/2014	10	\$250.00 \$250.00	0.2 0.4		Analyze emails from client Draft/analyze response to client emails
04/23/2014	10	\$250.00	0.8		Analyza/edit F. Dakan affidavit
04/23/2014	10	\$250.00	0.2	\$50.00	Analyze amail from client r
04/23/2014	15 10	\$190.00	2.5		Continue drafting summary judgment memorandum against ACI
04/23/2014 04/24/2014	10 10	\$250,00 \$250.00	0.8 1.8		Confer with D. Mollerup; edit memorandum of law  Analyze/outline motion for summary judgment against R.C. Worst
04/24/2014	10	\$250.00	1.9		Research motion for summary judgment against R.C. Worst
04/24/2014	10	\$250.00	0.3		Email opposing counsel regarding status of C. Reeves affidavit and
					analyze response to the same

04/24/2014 04/24/2014 04/24/2014 04/24/2014	15				
04/24/2014		\$190,00	0.2		Revise summary judgment memorandum against ACI
	15	\$190,00	3.4	\$646.00	
04/24/2014	15	\$190.00	7	\$1,330.00	Review Daily Reports provided by ACI
	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	6.0	\$240.00	Review research regarding subrogation to prior lien.
04/25/2014	3	\$300.00	3	\$900.00	
G-47EG7EG7.4	•	4030.50	•	2000.00	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	
					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	5.2	\$50.00	Analyze email from counsel for C. Reeves regarding affidavit changes
04/25/2014	10	\$250.00	0,6	\$150.00	
04/25/2014	15	\$190.00	5.1	\$969.00	
04/25/2014	15	\$190.00	0.5	395.00	
04/25/2014	15	\$196.00	0.3	\$152,00	Research effect of loan increase on priority
	10	\$250.00	2.2	\$550.00	Analyze documents to attach as exhibits to the affidavit
04/25/2014					
04/25/2014	10	\$250.00	1,9	\$475.00	Prepare for and participate in conference call with R. Dishnica, J.
					Holley, M. Brennan, G. Hendersen, D. Mollerup and homeowners
					group; amail 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 amail 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
amade alV : T		9204.90	V	900.00	analyze response to the same
n <i>aippip</i> n4.t	10	\$250.00	0.3	\$75.00	
04/28/2014		\$250.00		\$75.00 \$900.00	Analyze executed affidavit and amail 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	1.3	\$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. Hollev
05/05/2014	10	\$250.00	0.1	\$25.00	
UDFUOYZU 14	10	\$2\$U.UU	G, t	\$20.00	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	9.2	\$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	Oraft 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. Disinnica
05/07/2014	10	\$250.00	0.3	\$75,00	Analyze small from F. Elsaesser; small 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	Analyza/draft/adit stipulation to dismiss with prejudice
05/18/2014	15	\$190.00	3		Draft reply in support of summary judgment
05/18/2014 05/19/2014	<b>15</b> 10	\$190.00 \$250.00	3 3.9	\$975.00	Analyze/draftledit reply to ACI's opposition to summary judgment
05/19/2014	10	\$250.00		\$975.00	Analyza/draftledit reply to ACI's apposition to summary judgment motion
				\$975.00	Analyze/draftledit reply to ACI's opposition to summary judgment
05/19/2014	10	\$250.00	3.9	\$975.00 \$275.00	Analyza/draftledit reply to ACI's apposition to summary judgment motion
05/19/2014 05/20/2014	10	\$250.00 \$250.00	3.9	\$975.00 \$275.00	Analyze/draftledit reply to ACI's opposition to summary judgment motion Analyze/edit/finalize reply brief in support of summary judgment motion against ACI
05/19/2014	10 10	\$250.00	3.9	\$975.00 \$275.00 \$100.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion Analyze/edit/finalize reply brief in support of summary judgment motion against ACI Analyze/draft/edit notice of telephonic hearing regarding summary
05/19/2014 05/20/2014 05/27/2014	10 10 10	\$250.00 \$250.00 \$250.60	3.9 1,1 0.4	\$975.00 \$275.00 \$100.00	Analyze/draft/edit reply to ACI's opposition to summary judgment motion analyze/edit/finalize reply brief in support of summary judgment motion against ACI Analyze/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI
05/19/2014 05/20/2014 05/27/2014 05/27/2014	10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00	3:9 1:1 0:4 0:4	\$975.00 \$275.00 \$100.00 \$100.00	Analyze/draft/edit reply to ACI's opposition to summary judgment motion Analyze/edit/finalize reply brief in support of summary judgment motion against ACI Analyze/oraft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filed by Union Bank
05/19/2014 05/26/2014 05/27/2014 05/27/2014 05/27/2014	10 10 10 10 10	\$250.00 \$250.00 \$250.60 \$250.00 \$250.00	3:9 1,1 0.4 0,4 2,6	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00	Analyza/draftledit reply to ACI's opposition to summary judgment motion Analyze/edit/finalize reply brief in support of summary judgment motion against ACI Analyze/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filled by Union Bank Prepare for hearing on motions for summary judgment
05/19/2014 05/20/2014 05/27/2014 05/27/2014	10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00	3:9 1:1 0:4 0:4	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014	10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	3.9 1,1 0.4 0,4 2,6 0,3	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00	Analyze/draft/edit reply to ACI's opposition to summary judgment motion Analyze/edit/finalize reply brief in support of summary judgment motion against ACI Analyze/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014	10 10 10 10 10	\$250.00 \$250.00 \$250.60 \$250.00 \$250.00	3:9 1,1 0.4 0,4 2,6	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00	Analyza/draftledit reply to ACI's opposition to summary judgment motion against ACI Analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014	10 10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	3.9 1,1 0.4 0,4 2,6 0,3	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00	Analyze/draft/edit reply to ACI's opposition to summary judgment motion Analyze/edit/finalize reply brief in support of summary judgment motion against ACI Analyze/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014	10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	3.9 1,1 0.4 0,4 2,6 0,3	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00	Analyza/draftledit reply to ACI's opposition to summary judgment motion Analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draftledit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014	10 10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	3.9 1,1 0.4 0,4 2.6 0,3	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$725.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion against ACI analyza/edit/finalize reply brief in support of summary judgment motion against ACI analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion fied by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary judgment
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014	10 10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	3.9 1,1 0.4 0,4 2.6 0,3	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$725.00	Analyze/draft/edit reply to ACI's opposition to summary judgment motion against ACI Analyze/draft/edit notice of telephonic hearing regarding summary judgment motion against ACI Analyze/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R.C. Worst Telephone conference with B. Anderson regarding motion for summary judgment Analyze briefs and prepare for hearing on motions for summary judgment against R.C. Worst and ACI NW
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014	10 10 10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	3.9 1,1 0.4 0.4 2.6 0.3 0.2 2.3	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$725.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary judgment against R.C. Worst and ACI NW Analyza/draft adit stipulation for leephonic hearing
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014	10 10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	3.9 1.1 0.4 0.4 2.6 0.3 0.2 2.3	\$975.00 \$275.00 \$100.00 \$100.00 \$850.00 \$75.00 \$50.00 \$725.00 \$100.00 \$57.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion against ACI Analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary judgment against R.C. Worst and ACI NW Analyze briefs and prepare for hearing on motions for summary judgment against R.C. Worst and ACI NW Analyze/draft adit stipulation for telephonic hearing Telephone conference with W. Haberman;
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014	10 10 10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	3.9 1.1 0.4 9.4 2.6 0.3 0.2 2.3 0.4 0.3	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$725.00 \$100.00 \$57.00	Analyze/draft/edit reply to ACI's opposition to summary judgment motion against ACI Analyze/draft/edit notice of telephonic hearing regarding summary judgment motion against ACI Analyze/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary judgment Analyze briefs and prepare for hearing on motions for summary judgment against R.C. Worst and ACI NW Analyze/draft adit stipulation for telephonic hearing Telephone conference with W. Habemman; telephone conference with W. Habemman; telephone conference with W. Distrible
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 06/06/2014	10 10 10 10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$190.00	3.9 1,1 0.4 0.4 2.6 0.3 0.2 2.3 0.4 0.3 2	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$725.00 \$100.00 \$57.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion filed by Union Bank Prepare for hearing on motions for summary judgment Prepare for hearing on motions for summary judgment against R. C. Worst and AcI Analyza motion for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary judgment against R.C. Worst and ACI NW Analyza/draft adit stipulation for telephonic conference with W. Haberman; telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with R. Dishnica Prepare for summary judgment hearing
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 06/09/2014	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$190.00 \$190.00 \$190.00	3.9 1.1 0.4 0.4 2.6 0.3 0.2 2.3 0.4 0.3 2 2.5	\$975.00 \$275.00 \$100.00 \$100.00 \$850.00 \$75.00 \$50.00 \$725.00 \$100.00 \$57.00 \$380.00 \$95.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion against ACI Analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R.C. Worst Telephone conference with B. Anderson regarding motion for summary judgment against R.C. Worst and ACI NW Analyze/draft adit stipulation for lelephonic hearing Telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with R. Distinica Prepare for summary judgment purmary judgment hearing Attends summary judgment hearing
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 06/09/2014 06/09/2014 06/09/2014	10 10 10 10 10 10 10 10 10 10 15 15 15 15	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$190.00 \$190.00 \$190.00	3.9 1,1 0.4 0,4 2.6 0,3 0.2 2.9 0.4 0.3	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$100.00 \$57.00 \$380.00 \$95.00 \$19.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion against ACI Analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion filed by Union Bank Prepare for hearing on motions for summary judgment Prepare for hearing on motions for summary judgment against R. C. Worst Telephone conference with S. Anderson regarding motion for summary judgment against R. C. Worst and ACI NW Analyza briefs and prepare for hearing on motions for summary judgment against R.C. Worst and ACI NW Analyza/draft adit stipulation for telephonic hearing Telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with R. Distnice Prepare for summary judgment hearing Attend summary judgment hearing Attend summary judgment hearing E-mail D. Kreifels status update
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 06/09/2014	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$190.00 \$190.00 \$190.00	3.9 1.1 0.4 0.4 2.6 0.3 0.2 2.3 0.4 0.3 2 2.5	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$725.00 \$100.00 \$380.00 \$395.00 \$19.00 \$450.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion filed by Union Bank Prepare for hearing on motions for summary judgment Prepare for hearing on motions for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary judgment against R. C. Worst and ACI NW Analyze/draft adit stipulation for telephonic hearing Telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with W. B. Dishnica Prepare for summary judgment hearing Atlend summary judgment hearing E-mail D. Kreifels status update 3 Emails to G. Edson;
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05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 06/09/2014 06/09/2014 06/09/2014	10 10 10 10 10 10 10 10 10 10 15 15 15 15	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$190.00 \$190.00 \$190.00	3.9 1,1 0.4 0,4 2.6 0,3 0.2 2.9 0.4 0.3	\$975.00 \$275.00 \$100.00 \$100.00 \$850.00 \$75.00 \$50.00 \$725.00 \$100.00 \$57.00 \$380.00 \$19.00 \$19.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion Analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary judgment against R.C. Worst and ACI NW Analyze/draft adit stipulation for telephonic hearing Telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with R. Distinica Prepare for summary judgment hearing Atlend summary judgment hearing Atlend summary judgment hearing E-mail D. Kreifets status update 3 E-mails to R. Dischnica; email exchange with C. Piehl, County
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05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 06/09/2014 06/09/2014 06/09/2014	10 10 10 10 10 10 10 10 10 10 15 15 15 15	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$190.00 \$190.00 \$190.00	3.9 1,1 0.4 0,4 2.6 0,3 0.2 2.9 0.4 0.3	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$725.00 \$100.00 \$380.00 \$19.00 \$450.00 \$450.00	Analyza/draft/adit reply to ACI's opposition to summary judgment motion against ACI analyza/edit/finalize reply brief in support of summary judgment motion against ACI analyza/draft/adit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI draft/adit notions against R.C. Worst and ACI analyza motion field by Union Bank Prepare for hearing on motions for summary judgment against R. C. Worst and aci motion for summary judgment against R. C. Worst B. Anderson regarding motion for summary judgment against R. C. Worst and ACI NW Analyza/draft adit stipulation for telephonic hearing an application of the summary judgment against R.C. Worst and ACI NW Analyza/draft adit stipulation for telephonic hearing Telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with W. Brennan; telepho
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 06/09/2014 06/09/2014 06/09/2014	10 10 10 10 10 10 10 10 10 10 15 15 15 15 15	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$190.00 \$190.00 \$190.00 \$300.00	3.9 1,1 0.4 0,4 2.6 0,3 0.2 2.9 0.4 0.3 2 0.5 0,1 1.5	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$725.00 \$100.00 \$57.00 \$380.00 \$19.00 \$150.00 \$100.00 \$100.00 \$100.00 \$100.00 \$100.00 \$100.00 \$100.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion against ACI Analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyze motion filed by Union Bank Prepare for hearing on motions for summary judgment Telephone conference with C. Dodson regarding motion for summary judgment against R. C. Worst Telephone conference with B. Anderson regarding motion for summary judgment against R.C. Worst and ACI NW Analyze/draft adit stipulation for telephonic hearing Telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with R. Distinica Prepare for summary judgment hearing Attend summary judgment hearing E-mail D. Kreifets status update 3 Emails to G. Edson; amails to R. Dischnica; amail exchange with C. Pishl, County Freasurer; email exchange with M. Brennan Review Purchase Agreement form for sale of Note; review Idaho Code egarding Redemption; email client; amail G. Edson
05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 06/06/2014 06/09/2014 06/09/2014	10 10 10 10 10 10 10 10 10 10 15 15 15 15 15	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$190.00 \$190.00 \$190.00 \$300.00	3.9 1,1 0.4 0,4 2.6 0,3 0.2 2.9 0.4 0.3 2 0.5 0,1 1.5	\$975.00 \$275.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$75.00 \$100.00 \$57.00 \$100.00 \$57.00 \$380.00 \$190.00 \$450.00 \$450.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion against ACI Analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion field by Union Bank Prepare for hearing on motions for summary judgment Prepare for hearing on motions for summary judgment against R. C. Worst C. Dodson regarding motion for summary judgment against R. C. Worst Analyza briefs and prepare for hearing on motions for summary judgment Analyza briefs and prepare for hearing on motions for summary judgment against R.C. Worst and ACI NW Analyza/draft adit stipulation for telephonic hearing Telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with W. Brennia Demand Summary judgment hearing Attend summary judgment hearing hearing hearing hearing hearing hearing h
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05/19/2014 05/20/2014 05/27/2014 05/27/2014 05/27/2014 05/28/2014 05/28/2014 05/28/2014 05/28/2014 06/09/2014 06/09/2014 06/09/2014	10 10 10 10 10 10 10 10 10 10 15 15 15 15 15	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$190.00 \$190.00 \$190.00 \$300.00	3.9 1,1 0.4 0,4 2.6 0,3 0.2 2.9 0.4 0.3 2 0.5 0,1 1.5	\$975.00 \$275.00 \$100.00 \$100.00 \$100.00 \$650.00 \$75.00 \$50.00 \$725.00 \$100.00 \$57.00 \$380.00 \$450.00 \$450.00 \$450.00	Analyza/draft/edit reply to ACI's opposition to summary judgment motion against ACI Analyza/edit/finalize reply brief in support of summary judgment motion against ACI Analyza/draft/edit notice of telephonic hearing regarding summary judgment motions against R.C. Worst and ACI Analyza motion field by Union Bank Prepare for hearing on motions for summary judgment Prepare for hearing on motions for summary judgment against R. C. Worst C. Dodson regarding motion for summary judgment against R. C. Worst Analyza briefs and prepare for hearing on motions for summary judgment Analyza briefs and prepare for hearing on motions for summary judgment against R.C. Worst and ACI NW Analyza/draft adit stipulation for telephonic hearing Telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with W. Haberman; telephone conference with W. Brennia Demand Summary judgment hearing Attend summary judgment hearing hearing hearing hearing hearing hearing h

06/11/2014	10	\$250,00	0.3	\$75.00	M. Brannan; telephone conterence with N. Dishnica and M. Bretin and draft changes to Loan Purchase Agreement; small to purchaser. Analyze order dismissing RC Worst's claims with prejudice Analyze pleadings filed by ACI E-mail to M. Brannan regarding status; review email from R. Distnica: email to R. Disfinica
06/11/2014	10	\$250.00	0.6	\$150.00	
06/12/2014	3	\$300.00	0.4	\$120.00	
06/13/2014	3	\$300.00	0.6	\$180.00	E-mail to R. Dishnica; email to R. Stacey; email to R. Dishnica and M. Brennan re-con call.
06/16/2014	3	\$300.00	0.5	\$150.00	Telephone conference with R. Dishnica, M. Brenan and Buyer Analyze pleading filed by Union Bank 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
06/19/2014	10	\$250.00	0.3	\$75.00	
06/19/2014	10	\$250.00	0.4	\$100.00	

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	s	81.00	Analyze and respond to amails 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 9. Kramer; telephone conference with Mr. Kramer regarding conference call; analyze emails from W. Haberman
07/09/2014	10	<b>\$270.</b> 30	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	S	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	ŝ	567.00	Draft, analyze and adit motions to substitute Valiant as the real party in interest
07/15/2014	10	\$270.00	0.4	S	108.00	Talephone 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	S	378.00	Analyze and respond to small from R. Lynskay; analyze small from client; research foredosure issues
07/17/2014	10	\$270,00	1.1	\$	297.00	Analyze amail 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 amail 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 Vallant; telephone conference with court clerk regarding same; analyze and respond to email from opposing counsel; telephone conference with R. Lynskey; analyze Mr. Lynskeys 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	Oraft 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 adit motions to substitute Valiant as the real party in interest; analyze Court's memorandum decision granting motion for summary judgment; email client; analyze responses.

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08/08/2014	10	\$270.00	2,4 \$	648.00	Diraft, analyze and add 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;p analyze various documents
08/12/2014	10	\$270.00	1.2 \$	324.00	Analyze letter and email client;

08/13/2014	10	\$270.00	13 \$	351.00	
					Wells Fargo; analyze response to sams; email W. Habarman and B. Kramer regarding same; telephone conference with Mr. Haberman regarding same; analyze and edit changes requested by Mr. Weitman; email Mr. Weilman 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 Welfs Fargo; analyze/cuttine foreclosure complaint; analyze purchase and sale agreement; email client; analyze emails
08/15/2014	10	\$270,00	2.3 \$	621.00	from client and respond to same  Draft, analyze and edit foreclosure complaint; analyze emails from
08/18/2014	10	\$270.00	5.9 \$	1,593.00	client; analyze and draft responses to same Oraft, analyze and edit foreclosure complaint
08/19/2014	10	\$270,00	3.1 \$	337.00	Analyze, adit and final complaint, email same to W. Haberman; analyze email from R. Lynskey; amail blent 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 rea; party in interest for Wells Fargo; analyze and reply to email from 'M. Haberman; leave voicemail for R. Lynksev regarding same
08/21/2014 08/22/2014	10 10	\$270.00 \$270.00	0,3 <b>\$</b> 0.8 <b>\$</b>	81.00 216,00	Analyze pleadings Analyze amail from T. McLaughtin and proposed stipulation to priority
WO Jakes to C. T.			-		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 08/26/2014	15 10	\$195.00 \$270.00	0.2 <b>\$</b> 0.7 <b>\$</b>	39.00 189.00	Attend telephonic status conference Analyze emails from client; research issues with obtaining stipulated
09/02/2014	10	\$270.00	1.4 \$	378.00	judgment; draft/analyze email responding to same Analyze pleadings and fitigation issues
09/04/2014	10	\$270.00	0.8 \$	216.00	Telephone conference with G. Finney regarding 7 day extension to enswer complaint; analyze email from offent and draffanelyze reply to sems; analyze pleadings filed by North tidato Recorts and HOA related
09/08/2014	10	\$270.00	0.2 S	54.00	to the motion to substitute Vallant as the real party in interest. Telephone conference with R. Lynskey
09/10/2014	10	\$270.00	9.7 \$	189.00	Analyze email from client; telephone conference with W. Haberman
					- 150 150 - 150 150 150 150 150 150 150 150 150 150
09/12/2014	10	\$270.90	2.1 \$	567.00	Analyze email from C. Dodson; draftfeelt acceptance of service; enalyze email from T. McLaughtin regarding issues with maintenance facility; telephone conference with G. Finney regarding status of JV. LLC answers and request extension on behalf of ACI; analyze letter from FICA and email client regarding same; analyze response from client, analyze pleadings filed by North Idaho Resorts; analyze email from R. Lynskey; analyze amended filigation guarantee; email client.
09/12/2014	10	\$270.90	21 \$	567.00	Analyze email from C. Dodson; draft/edit acceptance of service; enalyze email from T. McLaughtin 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 serie; analyze response from client; analyze pleadings filed by. North kitarto Resorts;
09/12/2014	10	\$270.90	21 \$	567.00	Analyze email from C. Dodson; draftledit acceptance of service; analyze email from T. McLaughtin regarding lesues with maintenance facility; telephone conference with G. Finney regarding status of JV. LLC answer and request extension on behalf of ACI; analyze letter from FICA and email client regarding same; analyze response from client; analyze pleadings filed by. North idatio Reserts; analyze email from R. Lyeskey; analyze amended filigation guarantee; email client.
09/12/2014	10	\$270.90	21 \$	\$67.00	Analyze email from C. Dodson; draftledit acceptance of service; enalyze email from T. McLaughtin 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 isgarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. Lysskey; analyze amended tiligation guarantes; email client.
	10				Analyze email from C. Dodson; draftledit acceptance of service; enalyze small from T. McLaughtin regarding issues with relative transference in a service of the conference with G. Finney regarding status of JV. LLC answer and request extension on behalf of ACI: analyze letter from HOA and email client isgarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. Lynskey; analyze amended tiligation guarantee; email client.
09/12/2014	10	\$270.90 \$160.90	2.1 \$	567.00	Analyze email from C. Dodson; draftledit acceptance of service; enalyze email from T. McLaughtin regarding lesuses with maintenance feable; telephone conference with S. Finney regarding status of JV. LLC answer and request extension on behalf of ACI; analyze letter from HOA and email client legarding series; analyze response from client; analyze pleadings filed by North (dato Records; analyze email from R. byrskey; analyze amended filigation guarantes; email client.
		\$160.90			Analyze email from C. Dodson, draftledit acceptance of service; enalyze small from T. McLaughtin regarding issues with relative transference in a service of the conference with G. Finney regarding status of JV. LLC answer and request extension on behalf of ACI: analyze letter from HOA and email client isgarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. Lynskey; analyze amended tiligation guarantee; email client.
09/17/2014 99/18/2014	8.	\$160.90 \$160.00	0.6 \$	96.00	Analyze email from C. Dodson; draftledit acceptance of service; enalyze small from T. McLaughtin 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 ispanding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. byrskey; analyze amended filigation guarantee; email client.  Situdy matchs for deadlines; revise same.
09/17/2014	8	\$160.90	0.8.5	96.00 96.00 162.00	Analyze email from C. Dodson; draftledit acceptance of service; enalyze small from T. McLaughtin regarding lesues with maintenance facility; telephone conference with C. 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 thigation guarantee; email client.  Study matrix for deadlines; revise same  Telaphone conference with Netla Source regarding foreclosure action Analyze email from counsel for First American Title; analyze iffigation guarantee and draft and analyze response to same; coordinate with
09/17/2014 99/18/2014	8.	\$160.90 \$160.00	0.6 \$	96.00 162.00 81.00	Analyze email from C. Dodson, draftledit acceptance of service; analyze small from T. McLaughtin regarding issues with maintenance facility; telephone conference with G. Finner regarding status of JV. LLC analyze letter from HOA and email client regarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. Dysskey; analyze amended Rigation guarantee; email client.  Study matrix for deadlines; revise same.  Telaphrane conference with Netla Source regarding foreclosure action Analyze email from counsel for First American Title; analyze idigation guarantee and draft and analyze response to same; coordinate with secretary to provide client all pleadings  Analyze emails from client and reply to same; email client regarding
09/17/2014 09/18/2014 09/19/2014	8. 3 10	\$160.00 \$160.00 \$270.00	0.6 \$ 0.6 \$	96.00 162.00 81.00 208.00	Analyze email from C. Dodson; draftledit acceptance of service; analyze small from T. McLaughtin regarding issues with maintenance facility; telephone conference with G. Fenney regarding status of JV. LLC analyze feature of JV. North Idaho Resorts; analyze email from R. Lyraskey; analyze amended flagation guarantee; email client.  Study metric for deadlines; revise same.  Telephone conference with Netta Source regarding foreclosure action 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 Analyze amails from client and reply to same; amail ofient regarding site visit; analyze amails from client epity to same Study default matrix; prepare and final motion and supporting
09/17/2014 09/18/2014 09/19/2014	6 5 10	\$160.90 \$160.00 \$270.90	0.6 \$ 0.6 \$ 0.6 \$	96.00 162.00 81.00 208.00 432.00	Analyze email from C. Dodson; draftledit acceptance of service; enalyze small from T. McCaughtin regarding issues with maintenance facility; telephone conference with S. Finney regarding states of JV. LLC answer and request extension on behalf of ACI; analyze letter from FIOA and email client regarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze amail from R. Lynskey; analyze amended thigation guarantee; email client.  Telaphone conference with Netla Source regarding foreclosure action guarantee; email from counsel for First American Title; analyze liftgation guarantee and draft and analyze response to same; coordinate with secretary to provide client all pleadings Analyze emails from client and reply to same; amail client regarding site visit; analyze amails from client; reply to same Study default matrix; prepare and final motion and supporting pleadings for entry of default against T-O Engineers Travel from Coeur d'Alene, Idaho to Sandpoint, Idaho and visit Idaho
09/17/2014 09/18/2014 09/19/2014 09/24/2014 09/24/2014 09/25/2014 09/27/2014	<b>6</b> 10 10 15	\$160.90 \$160.00 \$270.00 \$270.00 \$270.00 \$225.00	0.6 \$ 0.6 \$ 0.6 \$ 1.3 \$ 1.6 \$ 0.4 \$	96.00 162.00 81.00 208.00 432.00 90.00	Analyze email from C. Dodson, drafted acceptance of service; analyze small from T. McCaughin regarding issues with maintenance facility, telephone conference with C. Finney regarding issues with maintenance facility, telephone conference with C. Finney regarding charts of JV. LLC answer and request extension on behalf of ACI; analyze letter from FLOA and email client regarding same; analyze response from client; analyze pleadings filed by North (athor Resorts; analyze email from R. bynskey; analyze amended litigation guarantee; email client.  Study mather for deadlines; review same  Telephone conference with Netla Source regarding foreclosure action Analyze email from counsel for First American Title; analyze illigation guarantee and draft and analyze response to same; coordinate with secretary to provide client all pleadings are seried and action of the pleadings are seried and action of the pleadings of the p
09/17/2014 09/18/2014 09/19/2014 09/24/2014 09/24/2014	6 10 10 6	\$160.00 \$270.00 \$270.00 \$160.00 \$270.00	0.6 \$ 0.6 \$ 0.6 \$	96.00 162.00 81.00 208.00 432.00 90.00 337.50 351.00	Analyze email from C. Dodson; draftledit acceptance of service; analyze small from T. Michaughin regarding issues with maintenance facility; beliephone conference with G. Finney regarding status of JV. LLC analyze fetter from HOA and email client egarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze email from R. byrskey; analyze amended litigation guarantes; email client.  Study match for deadlines; revise same.  Telaphone conference with Netla Source regarding foreclosure action guarantes; email client.  Study match for deadlines; revise same.  Telaphone conference with Netla Source regarding foreclosure action Analyze email from counsel for First American Title; analyze litigation guarantes and draft and analyze response to same; coordinate with secretary to provide client all pleadings Analyze amails from client and reply to same; amail client regarding site visit; analyze amails from client; reply to same Study default matrix; prepare and final motion and supporting pleadings for entry of default against T-O Engineers Travel from Cour d'Alerre, blan to Sandpoint, Idaho and visit Idaho Club site Research regarding licensing Telephone conference regarding permits; research same Analyze entry of default against T-O Engineers; outline answer to JV,
09/17/2014 09/18/2014 09/19/2014 09/24/2014 09/24/2014 09/25/2014 09/27/2014 10/01/2014	6 10 10 6 10	\$160.00 \$270.00 \$270.00 \$270.00 \$270.00 \$225.00 \$225.00	0.6 \$ 0.6 \$ 0.6 \$ 1.3 \$ 1.6 \$ 0.4 \$ 1.5 \$	96.00 162.00 81.00 208.00 432.00 90.00 337.50 351.00	Analyze email from C. Dodson; draftledit acceptance of service; enalyze small from T. McCaughtin regarding issues with maintenance facility; telephone conference with S. Finney regarding states of JV. LLC answer and request extension on behalf of ACI; analyze letter from FIOA and email client regarding same; analyze response from client; analyze pleadings filed by North Idaho Resorts; analyze amail from R. Lynskey; analyze amended litigation guarantee; email client.  Study matrix for deadlines; revise same  Telaphone conference with Netla Source regarding foreclosure action guarantee; 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 Analyze emails from client and reply to same; amail client regarding site visit; analyze amails from client; reply to same Study default matrix; prepare and final motion and supporting pleadings for entry of default against T-O Engineers Travel from Coeur d'Alente, Idaho to Sandpoint, Idaho and visit Idaho Club site Research regarding licensing Telephone conference regarding permits; research same

10/03/2014	10	\$270.00	3.1 S	837.00	Analyze purchase and sale agreements; draft/analyze/edit motions to appear as the real party in interest
			: 1	398.65.45 V	for Pensco Trust and MF08.
19/07/2014	10	\$270.00	3.1 \$	837.00	Analyzaridtafiveda affirmative defences to JV cross claim; analyzariadi. answer to JV, LLC diarns; analyza motion filed by VP; LLC; to J. Breaux re; golf course; t/o and emails with client;
10/08/2014	8	\$160.00	0.6 \$	96.00	confer w/ J. Sykes Strategy conference with R. Stacey:
10/10/2014	10	\$270.00	1,1 \$	297:00	Analyze withdrawelitecusel of Judge Griffin;
					analyza 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 \$	106.00	verify assignment of cases to new judge and hearing dates; email
10/20/2014	15	\$225.00	0.4 S	90.00	client re: the same and analyze response.  Attend motion to substitute hearing
10/24/2014	10	\$270.00	t.9 \$		Oraft 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	0.6 \$		Draft new notices of hearings for motions to substitute as the real party
10/28/2014	10	\$270.00	2.7 \$		in interest. 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 \$	1,377,90	Outline affidevit of C. Reeves; outline stips 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
10/30/2014	6	\$160.00	0.8 \$	128.00	affidavit of Charles Reeves. Revise stipulation to entry of judgment
10/30/2014	10	\$270.00	4.8 \$		Draff/analyze/edit stips to judgment against POBD, POBH and Mr./Mrs. Reeves; draff/analyze/edit affidavit of Charles Reeves; compile documents to affact; as, exhibits.
					and the country and the state of the state o
10/31/2014	16	\$270.00	2.9 \$	) ; ;	Analyze emails from client re: proposed stips to judgment; reply to the same; analyze/draft/edit stipulations to judgment; draft/edit/enalyze stipulation to entry of judgment against Sage Holdings; email amended stipulation to entry of judgment against First American; draft/enalyze proposed stipulation to entry of judgment; email opposing counsel re: changes necessary to same; email amed opposing counsel re:

11/05/2014	10	\$270.00	2.4 \$	648,00	Analyze email from C. Reeves: email dients 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; amail R. Lynskey questions related to tota
11/06/2014	10	\$279,00	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. Heberman and B. Kramer; analyze emails from clients;
11/07/2014	10	\$270.00	0.7 \$	189:00	Analyze email from client regarding changes to affidavits; anelyze email from client and respond to same; analyze amended attputation to judgment from First American.
11/08/2014	10	\$270.00	2,7 \$	729.00	Analyze email from C. Resives regarding effourations to judgment and affidavit; draft/analyze/edit changes to affidavit of C. Resives and stipulation to judgment by POBD; analyze whether any changes necessary to stipulation to judgment by Resives and POBDH; email client regarding same; analyze emails from client regarding.
11/10/2014	15	\$225.00	2.9 3	552.50	same; draft/analyze responses to same Draft memorandum; draft public records request;
11/10/2014	10	\$270.00	2,3 \$	621.00	telephone conference with J. Tindali Analyze amail from client; respond to same; telephone conference with client regarding same; begin analysis of project documents
	- 1931 - 21 - 22				
1/18/2014	18	\$270.00	3.6 \$	:	Review pleadings and identity legal descriptions for stipulation with Sage Holdings; confer with J. Sykes; analyze schedule for unavailable dates for trial; draft/analyze/edit complaint.
1/18/2014	10	\$270.00	3.6 \$		Sage Holdings; confer with J. Sykes; analyze schedule for unavailable dates for trial; draft/analyze/edit complaint
	10	\$270.00	3.6 \$	621.00 E	Sage Holdings; confer with J. Sykes; analyze schedule for unavailable dates for trial; draft/analyze/edit complaint.  Draft/analyze/edit motion to amend that party complaint;  passarch same; analyze service issues
1/78/2014 1/20/2014 1/21/2014	<b>10</b> 10	\$270.00 \$270.00 \$270.00	3.6 \$ 2.5 \$	<b>621:00</b> E	Sage Holdings; confer with J. Sykes; analyze schedule for unavailable dates for trief; draff/analyze/edit complaint  Draff/analyze/edit molice to amend third party completes;

11/25/2014	10	\$270.00	0.6	\$ 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 11/26/2014	6 10	\$270.00 \$270.00	0.4 : <b>0.1</b> :		
WW.				221 22 1028 22	
7,11,213.1					
Break a					
12/03/2014		\$270.00		1,184.00	Begin study of real property record
				440.00	
12/04/2014	10	\$270,00	0.8 1	216.00	Telephone conference with J. Finney regarding deposition dates and stipulation to judgment; telephone conference with T. McLaughlin;
100410044	6	\$270.00	3.2 5	854,00	email D. Kriefels; amail B. Anderson
12/04/2014					Continue study of real property records
12/06/2014	6	\$270.00	3.4 8	918.00	Study pleadings in prior cases related to summery addyment motions
					그리다 뭐 하나 오늘 얼굴은 사람들은 학생들은 사랑으로 보다고 있다.
12/09/2014	6	\$279.00	3.4 \$	918.00	Begin preparation of statement of facts for summary sudpment motion
					obe of the Science of Science of the Street Control of Science of Control of Control of Science of Control of
12/10/2014	6	\$270.00	5.2 \$	1,464.00	Study Reeves affidevit and pleadings; continue preparation of
12/11/2014	10	\$270.06	2.6 \$	702.00	statement of facts Analyze project documents; outline summary judgment arguments;
					draft notice of appearance on behalf of HLT and independent
					Mortgage; draftfanelyze/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
totto logica		50710 AO	77 f	50000	
12/12/2014	6	\$270.00	22 \$	594:00	Segin preparation of summery 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	Corries with J. Sykus;
12/16/2014	6	\$270.00	2.1 \$	567.00	analyze project documents; analyze legal description 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 amail 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	5	\$270.00	6 \$	1,620.00	Continue preparation of summary judgment motion and supporting pleadings; telephone conference with J. Hamilton;
12/18/2014	10	\$270.00	0.6 \$	162.00	study real property records  Draft default judgment against Timberline; draft stipulation to judgment
					with ACI
12/18/2014 12/18/2014	15 6	\$225.00 \$270.00	0.7 \$ 3.1 \$	157.50 837.00	Confer with J. Sykes regarding permits Continue research relating to permit issue; prepare
					correspondence to client
12/22/2014 12/24/2014	10 10	\$270.00 \$270.00	0:5 \$ 0.4 \$	162.00 108.00	Research motion for judgment on the pleadings  Analyze email and attached slipulation 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 6	\$225.00	0.3 \$ 0.9 <b>\$</b>	67.50 243.00	Revise memo regarding permit issues
12/29/2014 12/30/2014	6 10	\$270.00 \$270.00	0.9 \$	243.00 108.00	Prepare correspondence to client  E-mail to T. McLaughtin regarding issues with stipulation;
					draft/edit/analyze Panhandle Management discisimer of interest
12/30/2014 12/30/2014	6 6	\$270.00 \$270.00	3.4 <b>\$</b> 3.2 <b>\$</b>	918.00 864.00	Prepare declarations to support summary judgment memorandum Prepare interrogationes, requests for production and requests for
					admission to propound upon JV, North idaho Resorts and VP
01/05/2015 01/05/2015	6 6	\$270.00 \$270,00	0.9 \$ 2.9 \$	243.00 783.00	Telephone conference with clients Research Bonner County ordinances; leiephone
					conference with Bonner County amployee
01/05/2015 01/05/2015	6 6	\$270.00 \$270.00	3.1 \$ 1.2 \$	837.00 324.00	Continue preparation of summary judgment briefing Correspondence with client; research foreclosure sale issues
	· ·		,, <u> </u>		The state of the s

01/06/2015	10	\$270,00	0.4	\$ 108.00	Confer with J. Sykes
01/06/2015	,6	\$270.00	2.5		
	-	•=			prepare and revise motion and supporting pleadings to serve Grants
					by publication
01/08/2015	10	\$270.00	0.9	\$ 243.00	
					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 amail from
					counsel for Mountain West Bank
01/09/2015	10	\$270,00	0.4	\$ 108,00	
01/09/2015	6	\$270,00	0,6		
					correspondence with clients regarding same
01/09/2015	6	\$270.00	3,9	\$ 1,053.00	
04404045		0070 00	e a	£ 404.00	Judgment
01/12/2015 01/12/2015	6 6	\$270.00 \$270.00	5.2 0.3		
01/13/2015	6	\$270.00	1,2		
	-				stipulation to entry of judgment; revise same
01/13/2015	6	\$270.00	3.3	\$ 891.00	
	_		_		pleadings
01/14/2015	6	\$270.00	5	\$ 1,350:00	Prepare summary judgment supporting declaration of counsel; revise
01/15/2015	6	\$270.00	4.8	\$ 1,296.00	summary judgment memorandum Revise summary judgment legal arguments; final declaration of
3 17 10/20 10	J	<b>42</b> , 5.55		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	counsel
01/16/2015	10	\$270.00	3.1	\$ 837.00	Analyze email from Fidelity; email client regarding the same; enalyze
					response; analyze/edil draft reply; amail client;
					confer with J. Sykes; analyze and edit motion for summary judgment
0.40.004		anse no	3.5	2 045.00	confer with J. Sykes; telephone conference with T. Whitcomb
01/16/2015	6. 6	\$270.00 \$250.00	2.9		Telephone conference with olient; final summary judgment pleadings Prepare documents requested by client
01/20/2015	6	\$250.00	3.2		Prepare discovery requests to propound upon JV, NIR and VP
01/20/2015	6	\$250.30	1.3		Outline argument for summary judgment hearing
01/21/2015	10	\$270.00	0.3	81.00	Analyze letter from Fidelity
01/21/2015	5	\$270.00	0.3	\$ 81.00	Review correspondence and pleadings regarding publication of
	_	*			summons of Mr. and Mrs. Grant
01/21/2015	6	\$270.30 \$250.00	0.6 2.7		Telephone conference with D. Shafer
01/21/2015 01/22/2015	6. 6	\$250.00	0.5		Review and revise discovery requests to JV, NIR and VP Correspondence with clients
01/23/2015	6	\$250.00	2.5		Revise discovery requests [interrogatories, requests for production and
• (1000000000000000000000000000000000000	-	*			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
		Y-18 6			
24/20/2045		6570.00	0.4	108.00	
01/26/2015	6.	\$270.00	U2-4 - 3	100.00	Correspondence with B. Anderson regarding acceptance of service on behalf of HLT
		ે અનાનું ા		## (P)	
1 1922 - 2011					
3.02.02					"不是是我们的"我们在事情,我们还是不是的。" "
And the second					그 눈에 있었다. 그 아니는 그들도 하는 사람들에 살아가면 하지 않는 사람들은 사람들을 보고 하는 것은 것이다.
					그 등에 있었다. 그 그는 그는 모습이 가는 모습을 되어 가게 되는 것이 되었다. 그는 그 그를 모르게 달라는
1772 25					
	6				그 등에 있었다. 그 그는 그는 모습이 가는 모습을 되어 가게 되는 것이 되었다. 그는 그 그를 모르게 달라는
	<b>6</b>			324.90	
<b>01/29/2015</b> 01/29/2015	6	\$270.00 \$270.00	\$.2 \$ 0.2 \$	<b>324.90</b> 54.00	Prepare and the motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT
01/29/2015		\$270,00	1.2 \$	<b>324.90</b> 54.00	Prepare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain
<b>01/29/2015</b> 01/29/2015 02/02/2015	6	\$270.00 \$270.00 \$270.00	1.2 3 0.2 3 0.9 3	<b>324.93</b> 54.00 243.00	Prapare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank
<b>01/29/2015</b> 01/29/2015	6	\$270.00 \$270.00 \$270.00 \$270.00	1.2 \$ 0.2 3 0.9 \$ 1.2 \$	324.90 54.00 243.00 324.00	Prepare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information
01/29/2015 01/29/2015 02/02/2015 02/02/2015	6	\$270.00 \$270.00 \$270.00	1.2 3 0.2 3 0.9 3	324.90 54.00 243.00 324.00 380.00	Prapare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/03/2015	6 6 18	\$270,00 \$270,00 \$270,00 \$270,00 \$100,00	1.2 \$ 0.2 3 0.9 \$ 1.2 \$ 3.8 \$	324.50 54.00 243.00 324.00 380.00 106.00	Prepare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding littgation Review case law; codine argument
01/29/2015 01/29/2015 02/02/2015 02/02/2016 02/03/2016 02/03/2015 32/04/2015	6 6 18 10 <b>15</b>	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00	1.2 3 0.2 3 0.9 3 1.2 3 3.3 3 0.4 5 4.1 5	324.90 54.00 243.00 324.00 380.00 108.00 410.00	Propere and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case laws coeffice argument
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 92/04/2015 02/05/2015	6 6 18 10 16 10	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00	1.2 \$ 0.2 3 0.9 \$ 1.2 \$ 3.3 \$ 0.4 \$ 4.1 \$ 2.1	324.59 54.00 243.00 324.00 380.00 106.00 410.00 525.00	Prapare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; codine argument Review/analyze Summary Judgment responses
01/29/2015 01/29/2015 02/02/2015 02/02/2016 02/03/2016 02/03/2015 32/04/2015 02/05/2015 02/05/2015	6 6 18 10 16 10	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.8 \$ 0.4 \$ 4.1 \$ 5 1 \$ 0.3 \$ 5 0.3 \$	324.00 54.00 243.00 324.00 380.00 108.00 410.00 525.00 75.00	Prepare and Sie motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; cotfine argument Review-analyze Summary Judgment responses Email client regarding same
01/29/2015 01/29/2015 02/02/2015 02/02/2016 02/03/2016 02/03/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 18 10 10	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$100.00	1.2 \$ 0.2 3 0.9 1 1.2 \$ 3.3 \$ 0.4 \$ 4.1 \$ 2.1 \$ 0.3 \$ 3.9 \$	324.90 54.00 243.00 324.00 380.00 108.00 410.00 525.00 380.00	Propere and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; outfine argument Review/analyze Summary Judgment responses Emall client regarding same Draft research memorandum
01/29/2015 01/29/2015 02/02/2015 02/02/2016 02/03/2016 02/03/2015 32/04/2015 02/05/2015 02/05/2015	6 6 18 10 18 10 10 10	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.8 \$ 0.4 \$ 4.1 \$ 5 1 \$ 0.3 \$ 5 0.3 \$	324.00 54.00 243.00 324.00 380.00 108.00 410.00 525.00 75.00 390.00	Prepare and Sie motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; cotfine argument Review-analyze Summary Judgment responses Email client regarding same
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 18 10 10	\$270,00 \$270,00 \$270,00 \$270,00 \$100,00 \$270,00 \$100,00 \$250,00 \$250,00 \$100,00 \$270,00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.3 \$ 4.1 \$ 2.1 \$ 0.3 \$ 3.9 \$ \$ 0.6 \$	324.00 54.00 243.00 380.00 108.00 410.00 75.00 390.00 162.00 125.00	Prapare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding filigation Review case law; codine argument Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze smalls from client and confer with J. Sykes regarding same
01/29/2015 01/29/2015 02/02/2015 02/02/2016 02/03/2016 02/03/2015 32/04/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 16 10 10 10 18	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$100.00 \$250.00 \$270.00 \$270.00	1.2 \$ 0.9 \$ 1.2 \$ 3.8 \$ 0.4 \$ 4.1 \$ 2.1 \$ 3.9 \$ 9.6 \$ 9.5 \$	324.00 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 162.00	Prepare and Sie motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law, outline argument  Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissal by ACI
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 10 10 10 18 10 18 10 18	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.3 \$ 0.4 \$ 4.1 \$ 2.1 \$ 0.3 \$ 3.9 \$ 0.6 \$ 3 0.8 \$ \$ 0.8 \$	324.00 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 162.00 200.00	Prepare and sie motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; coffice argument  Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study the relating to proposed dismissal by ACI Telephone conference with W. Haberman
01/29/2015 01/29/2015 02/02/2015 02/02/2016 02/03/2016 02/03/2015 32/04/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 16 10 10 10 18	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.3 \$ 0.4 \$ 4.1 \$ 2.1 \$ 0.3 \$ 3.9 \$ 0.6 \$ 3 0.8 \$ \$ 0.8 \$	324.90 54.00 243.00 324.00 380.00 108.00 410.00 75.00 75.00 225.00 200.00	Propere and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; codine argument Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissel by ACI Telephone conference with W. Haberman
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 10 10 10 18 10 18 10 18	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.3 \$ 0.4 \$ 4.1 \$ 2.1 \$ 0.3 \$ 3.9 \$ 0.6 \$ 3 0.8 \$ \$ 0.8 \$	324.00 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 162.00 200.00	Prepare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding filtgation Review case law; codine argument Review-analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissal by ACI Telephone conference with W. Heberman
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 10 10 10 18 10 18 10 18	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.3 \$ 0.4 \$ 4.1 \$ 2.1 \$ 0.3 \$ 3.9 \$ 0.6 \$ 3 0.8 \$ \$ 0.8 \$	324.90 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 125.00 200.00	Propere and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; cottine argument Reviewanalyze Summary Judgment responses Emall client regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissal by ACI Telephone conference with W. Heberman
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 18 10 10 18 10 5 8	\$270,00 \$270,00 \$270,00 \$270,00 \$100:00 \$270,00 \$100,00 \$250,00 \$100,00 \$250,00 \$250,00 \$250,00 \$250,00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.3 \$ 4.1 \$ 2.1 \$ 0.3 \$ 9.5 \$ 0.5 \$ 0.8 \$	324.30 54.00 243.00 324.00 380.00 108.00 410.00 525.00 75.00 390.00 125.00 200.00	Prepare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding filtgation Review case law; coding argument Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze smalls from client and confer with J. Sykes regarding same Study file relating to proposed dismissed by ACI Telephone conference with W. Heberman
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 10 10 10 18 10 18 10 18	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.3 \$ 0.4 \$ 4.1 \$ 2.1 \$ 0.3 \$ 3.9 \$ 0.6 \$ 3 0.8 \$ \$ 0.8 \$	324.90 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 125.00 200.00	Propere and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; cottine argument Reviewanalyze Summary Judgment responses Email claim regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissal by ACI Telephone conference with W. Haberman  Preview Pensco Trust documents from 8. Featherston;
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 18 10 10 18 10 5 8	\$270,00 \$270,00 \$270,00 \$270,00 \$100:00 \$270,00 \$100,00 \$250,00 \$100,00 \$250,00 \$250,00 \$250,00 \$250,00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.3 \$ 4.1 \$ 2.1 \$ 0.3 \$ 9.5 \$ 0.5 \$ 0.8 \$	324.30 54.00 243.00 324.00 380.00 108.00 410.00 525.00 75.00 390.00 125.00 200.00	Propose and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; codine argument Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissal by ACI Telephone conference with W. Haberman  Presents stipulation to reschadule summary (adament hearing) Review Penson Trust documents from B. Featherson; correspondence with B. Anderson regarding HLT Real Estate
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 6 18 10 18 10 10 18 10 5 8	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.8 \$ 4.1 \$ 2.1 \$ 0.3 \$ 9.9 \$ 0.5 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$	324.30 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 182.00 125.00 200.00	Prepare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding filtgation Review case law; codine argument Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze smalls from client and confer with J. Sykes regarding same Study file relating to proposed dismissed by ACI Telephone conference with W. Heberman  Prepare of publisher to reschedule summary (adgment hearing).  Review Pensco Trust documents from B. Featherston; correspondence with B. Anderson regarding HLT Real Estate
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 18 10 18 10 10 18 10 5 8	\$270,00 \$270,00 \$270,00 \$270,00 \$100:00 \$270,00 \$100,00 \$250,00 \$100,00 \$250,00 \$250,00 \$250,00 \$250,00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.3 \$ 4.1 \$ 2.1 \$ 0.3 \$ 9.5 \$ 0.5 \$ 0.8 \$	324.30 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 182.00 125.00 200.00	Propere and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; cottine argument Reviewanalyze Summary Judgment responses Email claim regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissal by ACI Telephone conference with W. Haberman  Preview Pensco Trust documents from B. Featherston; correspondence with B. Anderson regarding HLT Real Estate  Correspondence with S. Weeks and G. Finney regarding possible
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 6 18 10 18 10 10 18 10 5 8	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.8 \$ 4.1 \$ 2.1 \$ 0.3 \$ 9.9 \$ 0.5 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$	324.30 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 182.00 125.00 200.00	Prapare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; codine argument Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissal by ACI Telephone conference with W. Heberman  Preview Penson Trust documents from 8. Featherston; correspondence with B. Anderson regarding HLT Real Estate  Correspondence with S. Weeks and G. Finney regarding possible authorst conference
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 6 18 10 18 10 10 18 10 5 8	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.8 \$ 4.1 \$ 2.1 \$ 0.3 \$ 9.9 \$ 0.5 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$	324.30 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 182.00 125.00 200.00	Propere and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; cottine argument Reviewanalyze Summary Judgment responses Email claim regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissal by ACI Telephone conference with W. Haberman  Preview Pensco Trust documents from B. Featherston; correspondence with B. Anderson regarding HLT Real Estate  Correspondence with S. Weeks and G. Finney regarding possible
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/03/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 6 18 10 18 10 18 10 15 10 15 15 15 15 15 15 15 15 15 15 15 15 15	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.2 \$ 0.3 \$ 0.4 \$ 0.5 \$ 0.8 \$ 0.2 \$	324.90 54.00 243.00 380.00 108.00 410.00 75.00 390.00 162.00 225.00 200.00	Propose and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding litigation Review case law; codine argument Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze emails from client and confer with J. Sykes regarding same Study file relating to proposed dismissel by ACI Telephone conference with W. Haberman  Prepares stipulation to reschadule summary judgment hours, correspondence with S. Weeks and G. Finney regarding possible settlement conference
01/29/2015 01/29/2015 02/02/2015 02/02/2015 02/02/2015 02/03/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015 02/05/2015	6 6 6 18 10 18 10 10 18 10 5 8	\$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00 \$100.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	1.2 \$ 0.2 \$ 0.9 \$ 1.2 \$ 3.8 \$ 4.1 \$ 2.1 \$ 0.3 \$ 9.9 \$ 0.5 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$ 0.5 \$ 0.8 \$	324.30 54.00 243.00 380.00 108.00 410.00 525.00 75.00 390.00 182.00 125.00 200.00	Prepare and file motion for entry of default of Bar K, Inc. Telephone conference with B. Anderson regarding acceptance of service for HLT Review final and serve stipulation to entry of judgment with Mountain West Bank Contact Bonner County to obtain information Research requirements related to clubhouse Confer with J. Sykes regarding filtgation Review case law; codine argument Review/analyze Summary Judgment responses Email client regarding same Draft research memorandum Analyze smalls from client and confer with J. Sykes regarding same Study file relating to proposed dismissal by ACI Telephone conference with W. Heberman  Prepare of putation to reschedule summary judgment hearing.  Review Pensor Trust documents from B. Featherston; correspondence with B. Anderson regarding HLT Real Estate  Correspondence with S. Weeks and G. Finney regarding possible settlement conference

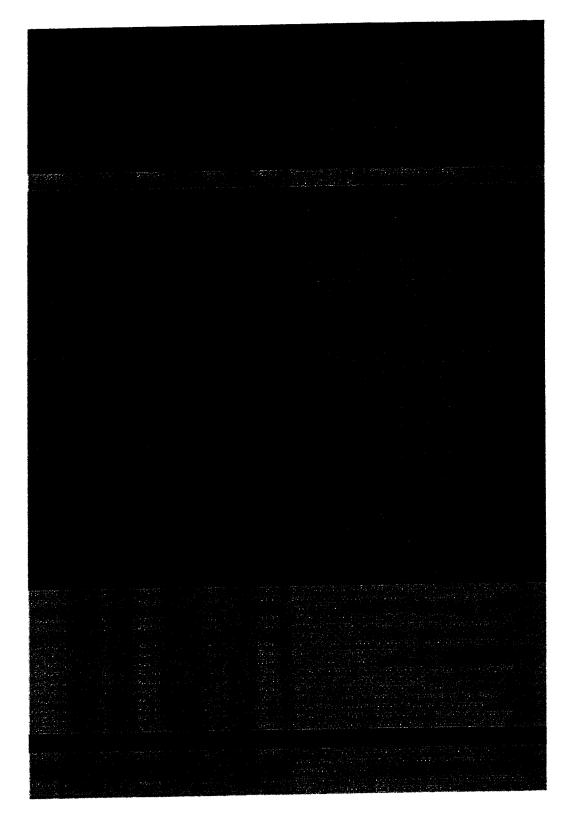
1724 1744 1713				Sec 16.51	
0000000	6	6370.05	2.6 \$	702.00	
02/18/2015	•	\$270,00	20.3	792.00	telephone conference with D. Shafer
02/19/2015	6	\$270.00	1.1 \$ 0.9 \$	297.00 225.00	Correspondence with D. Shafer regarding expert issues
02/23/2015	16	\$250.00	0.9 \$	223,00	Review/analyze emails from client and analyze/draft responses to the same
02/23/2015	10	\$250.00	2.1 \$	525.00	
				845 <u>0</u>	for summary judgment
41.00					
					Course of the case is the second of the seco
02/24/2015	6	\$250,00	42 \$	1,050.00	Continue preparation of reply memorance to summary judgment
				A STATE OF THE	oppositions by JV, NIR and VP
02/24/2015	8	\$270:00	2.2 \$	594,00	Prepare letter to Fidelity
Control of the contro					
93/03/2015	8	\$250.00	28 \$	700.00	Prepare correspondence to Fidelity
					. Lie estrucculus destrucción de la company de la comp
03/11/2015	8	\$250.00	2.2 \$	550.00	Begin preparation for hearing on summary judgment motions.
03/12/2015 03/12/2015	5 5	\$250.00 \$270.00	0.3 <b>\$</b> 0.3 <b>\$</b>	75.00 81.00	Correspondence with D. Shafer Correspondence with D. Shafer regarding expert ssues
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 03/16/2015	10 10	\$250.00 \$250.00	9.6 \$ 1,7 \$	150.00 425.00	Travel to and from meeting with D. Shafer Prepare for and attend meeting with D. Shafer
03/16/2015	10	\$250.00	0.6 \$	150.00	Analyze documents from D. Shafer
63/16/2015	8	\$250.00	2 \$	500.00	Appear for/sitiand hearing
03/16/2015 03/16/2015	6 6	\$250.00 \$250.00	0.2 \$ 0.5 \$	50.00 125.00	Telephone conference with D. Shafer Reviewfanalyze maps
03/16/2015	10	\$270.00	0.6 \$	182.00	Travel to and from meeting with O. Sheler
03/16/2015	10	\$270.00	1.7 \$	459.00 162.00	Prepare for and attend meeting with D. Shafer regarding expert issues
03/16/2015	10 6	\$270:00 \$270:00	0.6 \$ 0.2 \$	54.00	Analyze documents from D: Shafer Telephone conference with D: Shafer
03/16/2015	6	\$270.00	0.5 \$	135.00	Reviewlenstyze documentation prepared by O. Shafer
03/17/2015 03/17/2015	10 6	\$250.00 \$250.00	0.2 \$ 3.5 \$	50.00 875.00	Telephone conference with 8. Anderson regarding status of hearing
03/18/2015	8	\$250.00	6.5 \$	1,625.00	Travel to Spokene, Washington for summary judgment hearing Travel to Sandboint, ideho for summary judgment hearing and return
03/18/2015	6	enen an	22.5	900.00	to Spokene, Washington
03/18/2015	- 6	\$250.00 \$250.00	3.2 \$ 6.7 <b>\$</b>	800:00 175:00	Prepare for summary judgment hearing Telephone conference with clients following summary judgment
00/40/0045		enso 40	25.5	07E 06	hearing
03/18/2015 <b>03/19/2015</b>	6	\$250.00 \$250.00	3.5 \$ 0.2 \$	875.00 50.00	Return to Soise, Idaho from Spokene, Washington Review and respond to correspondence from W. Haberman
1950.00 (1985)	يعبي	er integral	DAY PARAME		
03/23/2015 03/23/2015	6	\$250.00 \$270.00	21 5	525.00 567.00	Review correspondence from and telephone conference with D. Shafer Review correspondence from and telephone conference with D. Shafer
03/24/2015	8	\$270.00	1.1 \$	297.00	Correspondence with B. Kramer;
03/24/2015	6	\$270.00	1.8 \$	486.00	telephons conference with S. Nieman Correspondence with D. Shafer regarding expert asues;
	*	az./ 4.00	•		correspondence with clients regarding same
03/24/2015	\$	\$250.00	0.9 \$	225.00	Correspondence with D: Shafer
03/24/2015	6	\$250.00	0.6 \$		Review matrix of properties
03/24/2015	5	\$250.00	0.3 \$		Correspondence with clients
<b>93/25/2015</b> 03/25/2015	<del>მ</del> 6	\$250.00 \$270.00	0.2 S 0.7 \$		Telephone conference with D. Shafer Correspondence with B. Kramer; telephone conference with J. Miller;
					(elephone conference with S. Nieman
03/25/2015 03/26/2015	6 6	\$270.00 \$270.00	0.2 \$ 0.9 \$		Telephone conference with D. Shafer regarding expert issues Telephone conference with D. Shafer, review documentation;
					correspondence with clients regarding same
03/26/2015 93/26/2015	6 6	\$250.00 \$250.00	1.3 \$ 9.4 \$		Prepare correspondence to D. Kreifels Review email correspondence
03/25/2015	6	\$250.00	0.4 \$		Review email correspondence Telephone conference with D. Shafer
03/26/2015	6	\$250.00	0.3 <b>\$</b>	75:00	Raview maps
03/26/2015 03/30/2015	6 10	\$250.00 \$250.00	0.2 \$ 2.1 \$		Correspondence with clients Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6	\$250.00	0.6 \$		Telephone conference with D. Shafer

03/30/2015	6	\$250.00	0.6 \$	150.00	
03/30/2015	5	\$250.00	0.4 \$ 2.1 \$	100.00 567.00	
03/30/2015	10	\$270.00	1.6 \$	432.00	
03/30/2015	6	\$270.00	1.0 4	432.00	telephone conference with clients regarding same
03/31/2015	6	\$250.00	0.3 \$	200.00	
03/31/2015	5	\$270.00	0.8 \$	218.00	
04/03/2015	5	\$270.00	1.2 \$	324.00	
04/03/2015	6	\$270.00	0.6 \$	162.00	
04/06/2015	6	\$276.00	0.4 \$	108.00	
04/06/2015	10	\$270.00	2.7 \$	729.00	
0-100/2013	,,,	\$210.00	2., 4	1 20,40	prepare outline regarding the same; telephone conference with 0.
					Shafer regarding the same
04/08/2015	6	\$270.00	0.3 \$	81.00	
04/10/2015	6	\$270.00	0.9 \$	243.00	
04/14/2015	6	\$270.00	1.1 \$	297.00	
04/15/2015	6	\$270.00	0.2 \$	54.00	
04/15/2015	6	\$250.00	0.5 \$	125.00	Correspondence with clients
04/15/2015	6	\$250.00	1.1 \$	275.00	
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
9-11 - Callago - Co		42.7			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	\$279.00	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 itigation
04/24/2015	6	\$270.00	t.3 \$	351.00	Confer with R. Stacey regarding litigation
94/27/2015	10	\$270.00	0.9 \$	243.00	Telephone conference with B. Haberman regarding summary judgmen
	.5			4	confer with J. Sykes regarding semie;
					email client; enalyze client response
04/28/2015	6	\$270.00	5.9 \$	1,593.00	Segin preparation of notice decree of foreclosure
05/08/2015	10	\$270.00	3.3 \$	891.30	Confer with J. Sykes regarding issues related to litigation
05/07/2015	10	\$279.00	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	\$279.90	4.1 \$	1,107.00	Analyze information from D. Shafer; guilline Shafer declaration;
		<b>4</b>			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 reques
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; analyza amail 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	\$279.00	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	5	\$279.00	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 \$	1,512.80	Analyze email and documents from R. Lynskey; confer with D. Shafar; telephone sonference with R. Lynskey and D. Shafar regarding the same; analyze documentation from R. Lynskey per conference call; analyze/draft/edit declaration of D. Shafar; email D. Shafar regarding the same; analyze/draft changes to declaration of D. Shafar; analyze/compile exhibits to declaration; analyze court scheduling order;
					draft expert witness disclosure for court; draft fact witness
CHOPOST		\$970 BA	99.5	4.050.00	disclosure for court; emails to and from B. Haberman
15/19/2015	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;
012012010	τυ.	WE ! U.UU	1,3 G	201,100	confer with C. Tipton regarding legal research;
					confer with J. Systes; prepare letter to Fidelity
					The second secon
5/28/2015	10	\$270.00	3.3 \$	891.00	Prepare for and participate in conference call with D. Shafer; outline additional documents; smalls with D. Shafer; analyze responses from D. Shafer
5/29/2015	18	\$100.00	0.7 \$	70.00	Research regarding foreclosure
5/29/2015	18	\$100.00	1.6 \$	160.00	Research regarding foreclosure
	1C	\$270.00	1.3 \$	351,00	Analyze documents for additional information requested by D. Shafer
	18	\$100.00	3.2 \$	320.00	Research regarding foreclosure
5/02/2015	18	\$1(R) (R)	37 🕏	3(31(11)	
5/29/2015 6/02/2015 6/03/2015 6/04/2015	18 10	\$100.00 \$270.00	3.7 \$ 2.1 \$	370.00 567.00	Research and memorandum regarding foreclosure 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	
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	
		*		,	prepare for and attend conference call with client;
					analyze (4) amails and attachments from D. Shafer; conference
					call with D. Shafer regarding documentation;
06/13/2015	10	\$270.00	0.4 \$	108.00	email B. Haberman  Analyze email from B. Haberman; telephone conference with D.
			,		Shafer regarding the same
06/15/2015	10	\$270.00	2.3 \$	621.00	
					telephone conference with D. Shafer; review motion for final judgment for bearing on same
STATE OF THE PARTY.			V. N. W	1966 P. 1. 11 1	
					그 생생하는 경상 소리를 하면 되었다면 하는 사람들이 들었는데 모든 사람이 없었다. 그런
				1.2.11 2.20	
And the second					
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est or					
06/17/2015	15	\$225.00	5.7 \$	1,282.50	Travel from Boise to Sandpoint, prepare for hearing, attend hearing,
06/17/2015	10	\$270.00	0.5 \$	162.00	telephone conference with Brian Kramar  Confer with C. Nicholson regarding outcome of hearing on motion for
BOI 17)2010	,,,	9210.00		,02,50	final adgment
06/18/2015	15	\$225100	2.1 5	472.50	E-mail hearing update to B. Haberman; travel Spokane to Boise
96/20/2015	18	\$100.00	4.1 \$	410.00	Research regarding property use and redemption
06/21/2015 06/22/2015	18 15	\$100.00 \$225.00	8.2 <b>\$</b> 0.5 <b>\$</b>	820.00 112,50	Research other state laws and regarding property use and redemption 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
96/22/2015	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 <b>\$</b> 1.9 <b>\$</b>	548.00	Research motion to reconsider
06/22/2015 06/23/2015	15 6	\$195.00 \$250:00	1.7 \$	379.50 425.00	Research motion to reconsider and opposition to summary judgment  Analyze client documents and property records
06/23/2015	ě	\$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 15(a)(2)(8) motion
06/23/2015	10	\$250.00	1 \$	250.00	Analyza memoraodum decision and order and confer with J. Sykes
06/23/2015	10	\$250.00	0.4 S	100,00	regarding the same Emet client
ATTACK TO SERVICE					Contraction (process and a process contractions)
96/23/2015	15	\$225.00	0.1 \$	22.50	Review of Memorandum Decision and Order regarding motion for
06/23/2015	6	\$270.00	1.2 5	324.00	Entry of Final Judgment Review draft of final judgment, correspondence with Fidelity
06/24/2015	15	\$195.00	0.9 \$	175.50	Segin drafting manufacting 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
08/24/2015	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 memorarida in opposition to JV/VP/NIR Motions to
06/25/2015	15	\$195.00	0.8 \$	156.00	Reconsider 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/analzye changes to reconditation and email client
					regarding the same; buttine proposed judgment and order; research
					foreclosure judgment; analyze amails to and from 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/adit/draft final judgment; calculate prejudgment interest amounts for judgment; confer with J. Sykes;
					analyze (5) smalls form client and draft/analyze responses to
					the same
06/26/2015	15	\$195,00	7.2 \$	1,404,00	Continue Brafting memoranda in opposition to JV.VP/NIR Motions to
06/26/2015	5	\$250.00	1.5 \$	375.00	reconsider  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 JVA/P/NIR Mollons to Reconsider
06/29/2015	6	\$250.00	1.9 \$	475.00	Ravise 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
96/30/2015 96/30/2015	10 10	\$270.00 \$270.00	0.4 <b>\$</b> 1 <b>\$</b>	108.00 270.00	Conference call with D. Shafer 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 amails from D. Shafer to R. Lynskey; amail D. Shafer regarding the same
07/04/2015	10	\$270,00	0.1 \$	27.00	Analyze smail 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 form 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
97/06/2015	10	\$250.00	1.4. \$	350.00	Draffrevise motion to vacate hearing date to serve opposition briefing
				7710.00	
07/07/2015	10	\$250.00	3,† \$	775.00	Prepare for motion to reconsider
07/07/2015	10	\$250.00	0.3 \$	75.00	Telephone conference with court clark regarding waiver of objection for
9110172015	10	\$234.90	0.3 3	/35,00	nuture) tigid stantinusi ensuranns samt contronns radiatonat santas, or objector, or
07/07/2015	10	\$250.00	0:1 \$	25.00	Analyze email from clerk regarding waiver of objection for untimely
07/07/2015	10	\$250.00	0.3 \$	75,00	Ernal client regarding status
07/07/2015	8	\$270.00	0.6 \$	162,00	Confer with R. Stacey
07/08/2015	6	\$270.00	0.9 \$	243,00	Research tex deads; confer with R. Stacey regarding same
		\$225.00	02 \$		
07/08/2015 07/08/2015	15 10	\$225.90 \$270.00	0.2 \$ 0.6 \$	45.00 162.00	Analysis of redemption deed statutes with J. Sykes Analyse smalls from D. Shafer and respond to the same; analyse
07/08/2015	15			45.00	Analysis of redemption deed statutes with J. Sykes  Analyse smalls from D. Shafer and respond to the same; analyze  email from D. Staples; falephone conference with W. Haberman re same;
07/08/2015 07/08/2015	15	\$270.08	0.6 \$	45.00 162.00	Analysis of redemption deed statutes with J. Sykes  Analyse emails from D. Shafer and respond to the same; analyze  email from D. Staples; telephone conference with WHaberman re same;  analyze emails from W. Haberman
07/08/2015	15			45.00	Analysis of redemption deed statutes with J. Sykes Analyse emails from D. Shafer and respond to the same; analyze email from D. Staples; felephone conference with WHaberman re same; analyze emails from -W. Haberman Travet to and from Sandpoint; Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to
07/08/2015 07/08/2015 07/08/2015 07/08/2015	15 10 10 10	\$270.00 \$250.00 \$250.00	0:8: \$. 9:7: \$ 3:4: \$	45.00 162.00 2,425.00 850,00	Analysis of redemption deed statutes: with J. Sykes  Analyse emails from D. Shafers and respond to the same; analyze email from D. Staples; falephone conference with W. Haberman re same; analyze emails from W. Haberman Travet to and from Sandpoint, Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015	15 10 10 10	\$270.00 \$250.00 \$250.00 \$250.00	9.7 \$ 3.4 \$ 2.7 \$	45.00 162.00 2,425.00 850.00 675.00	Analyze emails from D. Shafer and respond to the same; analyze emails from D. Shafer and respond to the same; analyze emails from D. Staples; telephone conference with WHaberman resame; analyze emails from W. Haberman Travet to and from Sandpoint; Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counsel for first time at oral argument and caseigaw related to the same
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015	15 10 10 10 10	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00	0.8° \$. 9.7° \$. 3.4° \$. 2.7° \$. 0.3° \$.	2,425.00 850.00 675.00	Analysis of redemption deed statutes: with J. Sykes  Analyze smalls from D. Sharier and respond to the same; analyze  email from D. Stapies; falephone conference with W. Haberman re same;  analyze emails from W. Haberman  Travel to and from Sandpoint, Idaho  Prepars for and argue in opposition to NIR, VP and JV's motions to  reconsider  Analyze statutes recited by opposing counset for first-time at oral  argument and caselaw related to the same  Analyze amail from client
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015	15 10 10 10	\$270.00 \$250.00 \$250.00 \$250.00	9.7 \$ 3.4 \$ 2.7 \$	45.00 162.00 2,425.00 850.00 675.00 75.00	Analyze emails from D. Shafer and respond to the same; analyze emails from D. Shafer and respond to the same; analyze emails from D. Staples; telephone conference with WHaberman resame; analyze emails from W. Haberman Travet to and from Sandpoint; Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counsel for first time at oral argument and caseigaw related to the same
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015	18 10 10 10 10 10	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00	0.8 \$ 9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$	45.00 162.00 2,425.00 850.00 675.00 75.00	Analysis of redemption deed statutes: with J. Sykes  Analyze emails from D. Shades; tale respond to the same; analyze email from D. Staples; telephone conference with W. Haberman re same; analyze emails from W. Haberman  Travet to and from Sandpoint, Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider  Analyze statutes recited by opposing counset for first time at oral argument and caselaw related to the same  Analyze amail from client  Draffanalyze response to client email Prepare for and participate in conference call with B. Haberman and D.  Shafer; analyze multiple
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015	18 10 10 10 10 10	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00	0.8 \$ 9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$	45.00 162.00 2,425.00 850.00 675.00 75.00	Analysis of redemption deed statutes: with J. Sykes Analyse emails from D. Shafer; and respond to the same; analyze email from D. Staples; Bilephone conference with WHaberman re same; analyze emails from W. Haberman Travet to and from Sandpoint; Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same Analyze analytic motion Draft/analyze response to client email Prepare for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachmants from D. Shafer and B. Haberman;
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015 07/09/2015	15 10 10 10 10 10 10	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00	9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$	45.00 162.00 2,425.00 350.00 675.00 75.00 50.00 1,053.00	Analysis of redemption deed statutes: with J. Sykes  Analyze emails from D. Shafer; and respond to the same; analyze email from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman  Travet to and from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider  Analyze statutes recited by opposing counset for first time at oral argument and caselaw related to the same  Analyze amail from client  Draffanalyze response to client email Prepars 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
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015	18 10 10 10 10 10	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00	0.8 \$ 9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$	45.00 162.00 2,425.00 850.00 675.00 75.00 50.00 1,053.00	Analyzis of redemption clear statutes with J. Sykas  Analyzis emails from D. Shafer and respond to the same; analyze email from D. Staples; telephone conference with WHaberman Travel to and from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same Analyze amail from client Draft/analyze response to client email Prepars 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 and yze property on Bonner County
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015 07/09/2015	15 10 10 10 10 10 10	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00	9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$	-45.00 162.00 2,425.00 850.00 675.00 75.00 1,053.00 783.00	Analyzis of redemption deed statutes: with J. Sykes Analyzis emails from D. Shafer, and respond to the same; analyze email from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travet to and from Sandpoint, Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first-time at oral argument and caselaw related to the same Analyze amail from client Draffanalyze response to client amail 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 Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements;
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00	9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$	45.00 162.00 2,425.00 850,00 675.00 75.00 50.00 1,053.00	Analysis of redemption deed statutes: with J. Sykes Analyse 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 Travet to and-from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first time at oral argument and caselaw related to the same Analyze amail from client Draft/analyze response to client email Prepars for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer; analyze property on Bonner County Assessor's website Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer;
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00	9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$	45.00 162.00 2,425.00 350.00 675.00 75.00 1,053.00 783.00	Analyzis of redemption deed statutes: with J. Sykes Analyzis emails from D. Shafer; and respond to the same; analyze email from D. Staples; falephone conference with WHaberman re same; analyze emails from W. Haberman Travet to and from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first time at oral argument and caselaw related to the same Analyze amail from client Draffanalyze response to client email Prepars 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 Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer; 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
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/19/2015 07/13/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00	9.7 \$. 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$ 4.3 \$	45.00 162.00 2,425.00 850,00 675.00 75.00 1,053.00 783.00	Analysis of redemption deed statutes: with J. Sykes Analyse 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 Travet to and from Sandpoint, Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first time at oral argument and caselaw related to the same Analyze amail from client Draffanalyze response to client email Prepare for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer analyze property on Bonner County Assessor's website Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman; draft/analyze amail to him regarding the same Analyze/draft/edit motion for proposed order; legal research re same
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07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015 07/19/2015 07/13/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00	9.7 \$. 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$ 4.3 \$ 2.7 \$	45.00 162.00 2,425.00 850.00 675.00 75.00 50.00 1,053.00 1,161.00	Analyza emails from D. Shafer and respond to the same; analyze emails from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travet to and-from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first time at oral argument and caselaw related to the same Analyze small from client Draft/analyze response-to client email Prepars for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and retarchments from D. Shafer and B. Haberman; analyze documents from D. Shafer; analyze property on Bonner County Assessor's website Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman; draft/analyze armail to him regarding the same Analyze/draft/edit motion for proposed order; legal research re same Analyze/draft/edit motion for proposed order; analyze emails from B. Haberman and P. Shafer analyze emails from B. Haberman and P. Shafer analyze emails to and respond to the same; analyze emails from B. Haberman and P. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same.
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/19/2015 07/13/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00	9.7 \$. 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$ 4.3 \$	46.00 162.00 2,425.00 850.00 675.00 75.00 50.06 1,063.00 1,161.00	Analysis of redemption deed statutes with J. Sykos  Analyza emails from D. Shafer and respond to the same; analyze email from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travel to and-from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first-time at oral argument and caselaw related to the same Analyze amail from client Draft/analyze response to client email Preoars 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 emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman; analyze emails to and from B. Haberman; analyze emails to and from B. Haberman; analyze/draft/edit motion for proposed order; legal research re same 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
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/10/2015 07/13/2015 07/14/2015 07/14/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00 \$270.00	0.6 \$	45.00 162.00 2,425.00 850.00 675.00 75.00 50.00 1,053.00 1,161.00 837.00 729.00	Analyze smalls from D. Shafer and respond to the same; analyze emails from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travet to and from Sandpoint; Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same Analyze amail from client Draft/analyze response to client email Prepare for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer analyze property on Bonner County Assessor's website Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze emails to emails to mellet from B. Haberman; draft/analyze email to him regarding the same Analyze/draft/edit motion for proposed order; legal research re same Analyze/draft/edit motion for proposed order; analyze emails from B. Haberman and D. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same.
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015 07/10/2015 07/13/2015 07/13/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00	0.6 \$	-45.00 162.00 2,425.00 850.00 675.00 75.00 1,063.00 1,161.00 837.00 729.00	Analysis of redemption deed statutes with J. Sykos Analyza emails from D. Shafer; and respond to the same; analyze email from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travel to and-from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first time at oral argument and caselaw related to the same Analyze amail from client Drafflansilyze response to client email Preoars 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 emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman; draft/analyze emails to him regarding the same Analyze/draft/edit motion for proposed order; legal research re same 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 Research regarding sheriff requirements Confer with C. Tipton regarding research;
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/10/2015 07/13/2015 07/14/2015 07/14/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00 \$270.00	0.6 \$	45.00 162.00 2,425.00 850.00 675.00 75.00 50.00 1,053.00 1,161.00 837.00 729.00 851.00 80.00 459.30	Analyze smalls from D. Shafer and respond to the same; analyze emails from D. Staples; telephone conference with WHaberman re same; analyze emails from S. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travet to and from Sandpoint; Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same Analyze amail from client Draft/analyze response to client amail Prepare for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer analyze property on Bonner County Assessor's website Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer; analyze emails and platting requirements; analyze establists emails to and from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman; draft/analyze email to him regarding the same Analyze/draft/edit motion for proposed order; legal research re same Analyze/draft/edit motion for proposed order; analyze emails in and from B. Haberman and D. Shafer Research regarding the same  Analyze/draft/edit motion for proposed order; analyze emails from B. Haberman and P. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; a
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/19/2015 07/13/2015 07/13/2015 07/15/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00	9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$ 4.3 \$ 2.7 \$ 2.7 \$	-46.00 162.00 2,425.00 850.00 675.00 75.00 1,063.00 783.00 1,161.00 837.00 729.00	Analyzis of redemption deed statutes with J. Sykos Analyzis emails from D. Shafer; and respond to the same; analyze email from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travel to and-from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first time at oral argument and caselaw related to the same Analyze amail from client D'attitanalyze response to client email Prepars 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 emails and attachments from D. Shafer; analyze emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman and D. Shafer; Analyze/draft/edit motion for proposed order; legal research re same 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 Research regarding sheriff requirements Confer with C. Tipton regarding research; analyze legal memo; analyze email from court clerk; draft/analyze amail to B. Haberman regarding the same; analyze response
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/10/2015 07/13/2015 07/14/2015 07/14/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00 \$270.00	0.6 \$	45.00 162.00 2,425.00 850.00 675.00 75.00 1,063.00 783.00 1,161.00 837.00 729.00 80.00 459.00	Analyze smalls from D. Shafer and respond to the same; analyze emails from D. Staples; telephone conference with WHaberman re same; analyze emails from S. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travet to and from Sandpoint; Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same Analyze amail from client Draft/analyze response to client amail Prepare for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer analyze property on Bonner County Assessor's website Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer; analyze emails and platting requirements; analyze establists emails to and from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman; draft/analyze email to him regarding the same Analyze/draft/edit motion for proposed order; legal research re same Analyze/draft/edit motion for proposed order; analyze emails in and from B. Haberman and D. Shafer Research regarding the same  Analyze/draft/edit motion for proposed order; analyze emails from B. Haberman and P. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; analyze emails and attachments from P. Shafer and respond to the same; a
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/19/2015 07/13/2015 07/13/2015 07/15/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00	9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$ 4.3 \$ 2.7 \$ 2.7 \$	-46.00 162.00 2,425.00 850.00 675.00 75.00 783.00 1,161.00 837.00 729.00	Analysis of redemption deed statutes with J. Sykos Analyza emails from D. Shafer and respond to the same; analyze email from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travel to and-from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first time at oral argument and caselaw related to the same Analyze amail from client Draft/analyze response to client email Prepars 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 emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman and D. Shafer; analyze exhibits emailed from B. Haberman; draft/analyze emails to him regarding the same Analyze/draft/edit motion for proposed order; legal research re same 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 Research regarding sheriff requirements Confer with C. Tipton regarding research; analyze legal memo; analyze email from court clerk; 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;
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/19/2015 07/13/2015 07/13/2015 07/15/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00	9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$ 4.3 \$ 2.7 \$ 2.7 \$	45.00 162.00 2,425.00 850.00 675.00 75.00 1,053.00 783.00 1,161.00 837.00 729.00 459.00	Analyza smalls from D. Shafer and respond to the same; analyze emails from D. Staples; telephone conference with WHaberman re same; analyze emails from S. Staples; telephone conference with WHaberman re same; analyze emails from S. Staples; telephone conference with WHaberman re same; analyze emails from S. Sandpoint, Idaho Prepare for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counsel for first-time at oral argument and caselaw related to the same Analyze amail from client Draft/analyze response to client amail 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 emails and attachments from B. Haberman and D. Shafer 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 Analyze/draft/edit motion for proposed order; legal research re same Analyze/draft/edit motion for proposed order; analyze emails from B. Haberman and respond to the same; analyze emails and attachments from B. Haberman and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from B. Haberman and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same; analyze emails and attachments from D. Shafer and respond to the same email from court clerk; draft/analyze amail to B. Haberman regarding the same; analyze response Oraft/analyze email to B. Haberman regarding the same; analyze response Oraft/analyze orafile telephone conference with B. Haberman;
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/19/2015 07/13/2015 07/13/2015 07/15/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00	9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$ 4.3 \$ 2.7 \$ 2.7 \$	-45.00 162.00 2,425.00 850.00 675.00 75.00 783.00 1,161.00 837.00 729.00	Analyzis of redemption deed statutes with J. Sykos Analyzis emails from D. Shafer and respond to the same; analyze email from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travel to and-from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first-time at oral argument and caselaw related to the same Analyze amail from client D'affilansiyze response-to client email Preoars 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 emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; Analyze/draffledit motion for proposed order; legal research re same Analyze/draffledit motion for proposed order; legal research re same Analyze/draffledit motion for proposed order; analyze emails from B. Haberman and respond to the same; analyze emails from B. Haberman and respond to the same  Analyze/draffledit motion for proposed order; analyze emails from B. Haberman and respond to the same Confer with C. Tipton regarding research; analyze email to B. Haberman regarding the same; analyze proposed order of sale; telephone conference with B. Haberman; email B. Haberman; analyze email from C. Reeves; edit declaration; analyze amails regarding the same; edit declaration; analyze amails regarding the same; edit declaration; analyze amails to the Shafer declaration; edit/analyze
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/09/2015 07/19/2015 07/13/2015 07/13/2015 07/15/2015 07/15/2015 07/17/2015 07/17/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00 \$270.00 \$270.00 \$270.00	0.6 \$	45.00 162.00 2,425.00 850.00 675.00 75.00 1,063.00 783.00 1,161.00 837.00 729.00 459.00	Analyze smalls from D. Shafer and respond to the same; analyze emails from D. Staples; telephone conference with WHaberman Travet to and-from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counsel for first time at oral argument and caselaw related to the same Analyze small from client Draftfanalyze response to client email Prepars for and participate in conference call with B. Haberman and D. Shafer; analyze multiple emails and attachments from D. Shafer; analyze property on Bonner County Assessor's website Legal research regarding order of sale; analyze emails and attachments from B. Haberman and D. Shafer; analyze emails and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman; draftfanalyze armail to him regarding the same Analyze/draftfedit motion for proposed order; legal research re same Analyze/draftfedit motion for proposed order; analyze emails from B. Haberman and D. Shafer canalyze armail to him regarding the same Analyze/draftfedit motion for proposed order; legal research re same Analyze/draftfedit motion for proposed order; analyze emails from B. Haberman and proposed order of sale same (analyze emails and respond to the same (analyze emails and attachments from D. Shafer and respond to the same (analyze emails and attachments from D. Shafer and respond to the same (analyze emails and attachments from D. Shafer and respond to the same (analyze emails and email analyze emails and email of the same (analyze emails and email analyze emails and ender of sale; telephone conference with B. Haberman; email from C. Reeves; edit declaration; leaphone conference with D. Shafer regarding declaration; analyze exhibits to the Shafer declaration; edit/analyze axhibits to the Shafer declaration; edit/analyze axhibits to the Shafer declaration; edit/analyze axhibits to the Shafer declaration; edit/analyze
07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/08/2015 07/09/2015 07/19/2015 07/13/2015 07/13/2015 07/15/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$270.00 \$250.00 \$250.00 \$250.00 \$250.00 \$270.00 \$270.00 \$270.00 \$270.00 \$100.00 \$270.00	9.7 \$ 3.4 \$ 2.7 \$ 0.3 \$ 0.2 \$ 3.9 \$ 4.3 \$ 2.7 \$ 2.7 \$	45.00 162.00 2,425.00 850.00 675.00 75.00 1,063.00 783.00 1,161.00 837.00 729.00 459.00	Analyzis of redemption deed statutes with J. Sykos Analyzis emails from D. Shafer and respond to the same; analyze email from D. Staples; telephone conference with WHaberman re same; analyze emails from W. Haberman Travel to and-from Sandpoint; Idaho Prepars for and argue in opposition to NIR, VP and JV's motions to reconsider Analyze statutes recited by opposing counset for first-time at oral argument and caselaw related to the same Analyze amail from client D'affilansiyze response-to client email Preoars 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 emails and attachments from B. Haberman and D. Shafer Research permits and platting requirements; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; analyze emails to and from B. Haberman and D. Shafer; Analyze/draffledit motion for proposed order; legal research re same Analyze/draffledit motion for proposed order; legal research re same Analyze/draffledit motion for proposed order; analyze emails from B. Haberman and respond to the same; analyze emails from B. Haberman and respond to the same  Analyze/draffledit motion for proposed order; analyze emails from B. Haberman and respond to the same Confer with C. Tipton regarding research; analyze email to B. Haberman regarding the same; analyze proposed order of sale; telephone conference with B. Haberman; email B. Haberman; analyze email from C. Reeves; edit declaration; analyze amails regarding the same; edit declaration; analyze amails regarding the same; edit declaration; analyze amails to the Shafer declaration; edit/analyze

					in support of the same; draft/analyze/edit motion for order of sale; analyze amails 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 <i>/22/2</i> 015 07 <i>/22/2</i> 015	15 10	\$225.00 \$270.00	1.7 \$ 6.1 \$	382,50 1,647,00	Research regarding water rights; lelephone conference regarding same; Outline changes to judgment and foreclosure decree per court's memorandum decision; analyze emails from C. Reeves and ctient; confer with C. Nicholson and J. Sykes regarding the same; draft/analyze multiple emails to dients 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 07/23/2015	10 10	\$250.00 \$250.00	1 \$ 1.6 \$	250.00 400.00	Ernail and telephone conferences (3) with client  Analyze/draft/edit changes to the judgment per court's memorandum
9172312013	10	3230.30	7.0 J	400.55	dicision darying 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 regiarding same; verify accuracy of plats; research legal issues
07/24/2015	8.	\$270.00	0:4 \$	108,00	Review/analyze decree of foreclosuse
07/27/2015	10	\$270.00	0:4 \$	108.00	Analyze emails from B. Haberman and respond to the same; analyze
97/28/2015	6	\$250.00	2.1 \$	525,00	email from R. Myers and respond to the same Prepare correspondence regarding decisions issued by court on motions for reconsideration
07/28/2015	10 10	\$250.00 \$270.00	0.2 \$ 1.6 \$	50,00 432,00	Analyze emails from R. Meyers and B. Haberman  Analyze email from R. Myers; analyze email from B. Haberman;
97/29/2016 97/30/2015	10	\$270.00	9.8 \$	218:00	analyze emails from B. Haberman to R. Myers; email B. Haberman; prepere for and telephone conference with B. Haberman; email title company; analyze sourt 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 Email R. Myers regarding teleconference to discuss status of case; amail 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.
008000		V. 17 11		11.1	
07/31/2015	10	\$250.00	24 \$	600:00	Analyza documents from Bonner County Assessor
					jednog prev paradiška pojedina policije i se izalicije se izalicije. Pro izalicije i se izalicije i se izalici
STATE OF THE PARTY				7	
08/03/2015	10	\$270.00	1.8. \$	432.00	Aralyzer Utility esseement focureents
08/05/2015	10	\$270.00	11.6 \$	3.132.00	Prepare for hearing; thevel to Sandpoint, ID and back to Boiles, ID; attend and argue is 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. Helberman-regarding outcome of hearing.
08/06/2015	18	\$190.00	8.1.5	510.00	Research Drectowing soles
06/06/2015	15	\$225.00	3.f \$	897.50	Research regarding foreclosure sales
06/06/2015	10	\$250.00	0.2 \$		Analyze email from Eddelity
08/07/2015	18	\$100.00	5.5 \$	550.00	Research credit talding



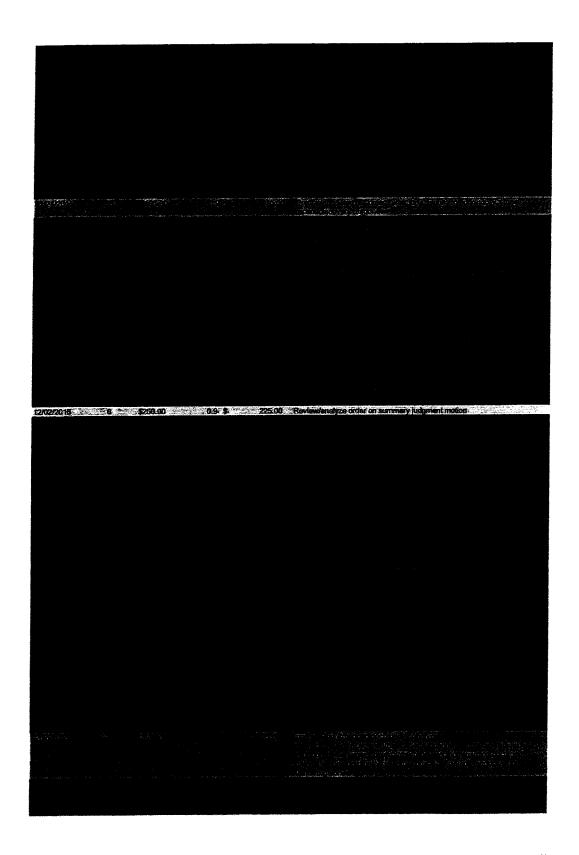
I:\1547.201\PLD\Post-Trial\AF&C-Breakdown by Party

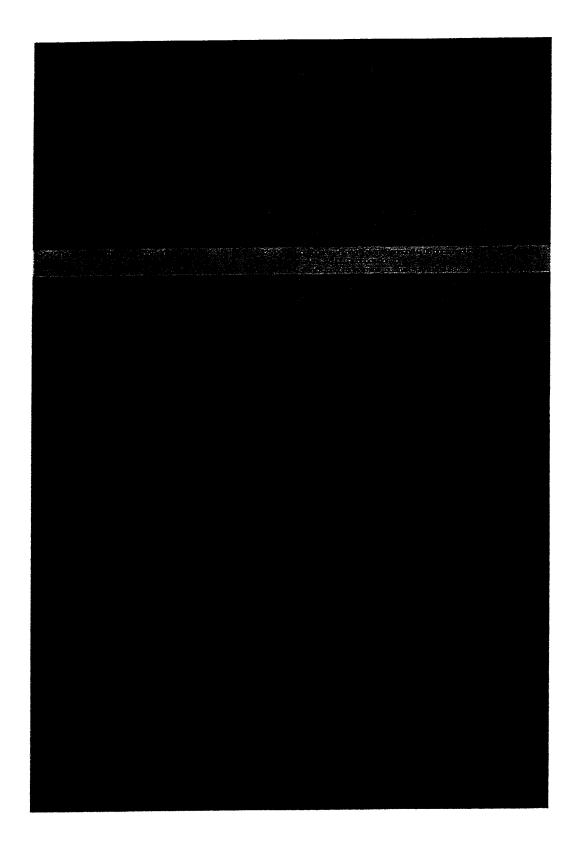
CAR KEET	1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	\$## (A. )			
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1.00					
AND THE					
09/02/2015	10	\$270.00	8.3 \$	2,241.00	Trevel from Boise, ID to Sandpoint, Idaho for the motion to atter/reconsider order of sale, prepare for hearing on Valent's motion
					to alter or reconsider foreclosure decree and order of sale; confer with
09/02/2015	6	\$250.00	2.7 \$	575.00	Sykes regarding the same; telephone conference with clients;     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 09/03/2015	6 6	\$250.00 \$250.00	1.6 S 3.2 S	400.00 800.00	Telephone conference with clients regarding outcome of hearings Return to Boise from Sandpoint, Idaho
09/03/2015	to	\$250.00	9.2 \$	50.00	Analyze emails and altechments from 8. Haberman
09/03/2015 09/03/2015	10: 10:	\$250.00 \$250.00	1 \$ 3 \$	250.00 750.00	Telephone conference with S. Haberman Travel from Sandpoint, ID to Boise, ID
99/03/2015	15	\$225.00	9.2 \$	45.00	Respond to clients' request for documents
<b>09/04/2015</b> 09/08/2015	10 10	\$250.00 \$250.00	1:9 \$ 0:3 \$	475.00 75.00	Analyze court ruling granting motion to reconsider Telephone conference with S. Haberman
09/08/2015	10	\$250.00	0.5 \$	125.00	Analyze order setting trial and premise order
					그는 말해요? 그리고 화가를 잃었습니다. 그런 그리고 하는 것이 되었다.
					그 경이 얼마나 되는 아이에 불가 있다면 얼마면 성과 경기로 이어 외국을 위한 겨울을 살으면 심어지었다.
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rational services					。 [1] [1] [1] [1] [1] [1] [1] [1] [1] [1]
09/10/2015	10	\$250.00	6.6 \$	1,650,00	Analyze Perisco and MF08 foen 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 center
2014 / 19045	15	PAGE AR	40.7	351.00	with C. Nicholson regarding the same
09/14/2015	10	\$195.00	1.8 \$	304:00	Begin drafting Memo Supp. Molion to Reconsider the Court's 9-4-15 decision; confer with J; Sylves 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	24 \$	608.00	Outline arguments for motion for aummary judgment
09/14/2015	10	\$250:00	1.5 \$	375.00	Meet to discuss motion to reconsider, summary judgment
09/14/2015	6	\$250:00	1.9 \$	475.00	and objection to proposed judgment Outline issues for third summary judgment motion
09/15/2015	15	\$195.00	0:2 \$	39.00	Discuss research project with C. Toton
39/15/2015	15	\$195.00	0.8 \$	156.00	Review and analysis of MF08 All-inclusive Mortgage & Loan
09/15/2015	15	\$195.00	0.8 \$	156.00	Agreement to propers 8. Ng Decl. Segin propering Ng Decl.
39/15/2015	18	\$100.00	2,3 \$	230,00	Discussion with C. Nicholson; Research regarding inconsistent
2014010045	10	eron on	a a de	205.00	declarations.
09/16/2015	18	\$100.00	3.8 \$	380,00	Discussion with C. Nicholson; Research regarding inconsistent declarations:
STATE OF THE STATE					
09/16/2015 09/17/2015	<b>15</b>	\$195.00 \$196.00	3.5 \$ 0.2 \$	682.50 39.00	Braft Seriev Ng dect. Correspondence with W. Haberman
09/17/2015	15	\$195.00	0.3 \$	58.50	Review and analyze: POBD mortgages with R.E. Loans, MF08 &
09/17/2015	15	\$195:00	1.3 \$	253.50	Pensico Review and analyze loan agreements between POBD and RE
				2.5	Loans/MF08
09/17/2015	15	\$195.00	0.9 \$	175.50	Review and analysis of notes between POBD & RE Loans, Pensco & MEOS.
09/17/2015	15	\$195.00	0.6 \$	117.00	Review and analysis of Pensco related documents received from 8. Ng
09/17/2015	15	\$195.00	2.1 \$	409.50	Review, analyze and compare Sorrowers Funding Authorization & Analyze with Settlement Statement relied upon by VP/NIR/JV and
					other closing documents (check stub to POBD, CA disclosure form,
no crame ar		enen on	22.5	75 40	oft: )
09/17/2015 09/17/2015	5 6	\$250.00 \$250.00	0.3 <b>\$</b> 3.2 <b>\$</b>	75,00 800.00	Review acteduting order regarding expert disclosures 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 09/17/2015	6 18	\$250.00 \$100.00	0.3 \$ 4.5 \$	75.00 450.00	Telephone conference with W. Haberman Research/Draft-Argument regarding-inconsistent Decl.
09/17/2015	6	\$270.00	1.2 \$	324.00	Telephone conference with F. Elsaesser regarding summary judgment
39/18/2015	15	\$195.00	0.1 \$	19:50	motion; telephone conference with W: Haberman Review Notice regarding proposed Judgment between VP, NiR & JV,
WOTHER TO		ψ 1.00.00	U/1 W	:0.00	order vacating 8/5/15 Judgment, and order vacating 8/5/15 decree of
09/18/2015	÷0.	6400.CO		120.00	foreclosure
09/18/2015 09/18/2015	18 15	\$100.00 \$195.00	1.2 \$ 0.8 \$		Research regarding inconsistent Decl: Telephone conference with J. Sykes, W. Haberman and E. Ford
09/18/2015	15	\$195.00	2:4 5	468.00	Continue drafting Ng declaration

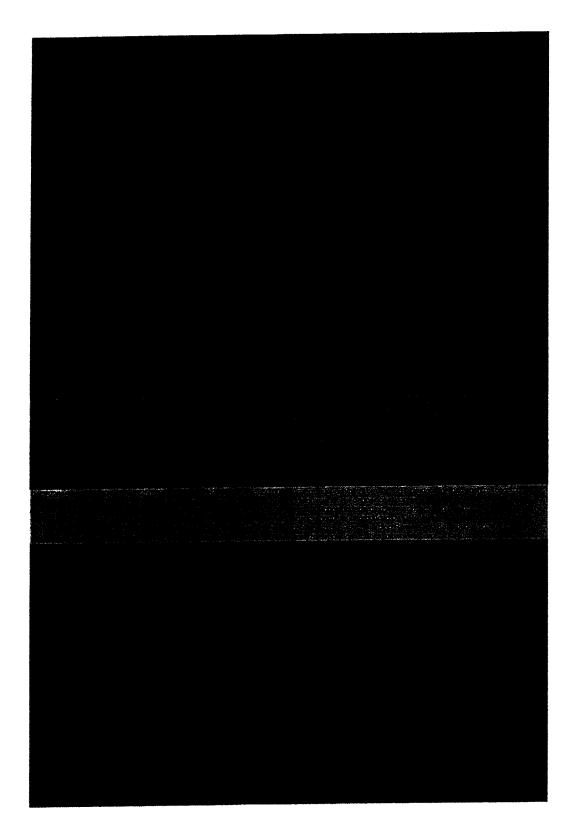
09/18/2015	6	\$250.00	1.4 \$	350.00	Revise declaration of 8. Ng
09/18/2015	6	\$250.00	0.3 \$	75.00	
09/19/2015	15	\$195,00	0,2 \$	39.00	
30/13/20/4		4.50,55			in conjunction with closing of RE Loans, Pensco and MF08 loans
09/20/2015	15	\$195.00	1.3 \$	253.50	
09/21/2015	15	\$195,00	0.9 \$	175,50	
Am + stars sa		<b>\$100,00</b>	3.0 4	0.00	and B.Ng
09/21/2015	15	\$195.00	0.3 \$	58.50	
09/21/2015	15	\$195,00	1.8 \$	351.00	
09/21/2015	15	\$195.00	0.2 \$	39.00	
09/21/2015	15	\$195.00	2. \$	390.00	
09/21/2015	5	\$250.00	1.2 \$	300.00	
09/21/2015	18	\$100.00	8.2 S	620.00	
09/22/2015	18	\$100.00	3.2 S	320.00	
09/22/2015	6	\$270.00	0.9 \$	243.00	Correspondence with S. Rasor
09/22/2015	6	\$270.00	1,1 S	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 draff Memo Supo 3rd MSJ
09/22/2015	š	\$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
COVERIDO (C	•	7200.00			and-First American
09/22/2015	6	\$250.00	9.8 \$	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 \$	1,818.50	Continue draft Summary Judgment
09/23/2015	15	\$195.00	0.6 S	117.00	Strategy discussion with J. Sykes and C. Tipton
09/23/2015	18	\$100.00	10.2 \$	1,020.00	Braft 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 S	975,00	Review and revise summary judgment memorandum and supporting
	•			0,00	oleadings
09/25/2015	6	\$250.00	9.2 \$	50.00	Correspondence wit S. Rasor
09/29/2015	10	\$250.00	2.7 S	675.00	Outline discovery to NIR and JV, LLC
09/29/2015	10	\$250.00	9.7 \$	175.00	Analyze scheduling order
09/29/2015	10	\$250.00	1.3 \$	325.00	Outline deposition notices to C. Reeves and R. Villetti
09/29/2015	6	\$250.00	1.2 \$	300,00	Outline issues regarding depositions, discovery and summary
	7	4400.00		200/00	judgment moliton
					Secretaria ( Seconda)
10/01/2015	1G	\$250.00	3,6 \$	900,00	Cuttine 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
100					
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					ा ते पर प्राप्त के प्रतिकृति के हैं तिराजन के लिए क्षेत्रण के बेट कर भी ते तरह की कर पाने कर पूर्व की पान प्रत प्रतिकृति के तिराजन कर प्रतिकृति के कि प्रतिकृति के लिए के लिए कि प्रतिकृति के लिए के लिए की कि प्रतिकृति के ल
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Patrick Commence					
<i>(</i> 1, 1, 1)					그 기문에 가마면에 하고, 상황한다고 있다고 되면 그러지 그리고 그는 그를 모르는 그는 사람
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		Contraction (Contraction)		1969 (3) 1822 (1971) 2723 (1971)	
10/08/2015	10	\$250.00	0.7 S	175.00	
10/08/2015 10/08/2015	10	\$250.00 \$250.00	9.8 S	175.80 200.00	Analyzer legal descriptions Reviewionalyzer emails from D. Strafer
10/08/2015		\$250.00		175.00	Analyzer lagal/descriptions Review/analyze emails from D. Strafer Talisphons-conformatic with D. Shafer
10/08/2015 10/08/2015 10/08/2015	10 10	\$250.00 \$250.00 \$250.00	G.8 \$ 0.5 \$	175.00 200.00 125.00	Analyse lagal descriptions Review/analyse emails from 0. Shafer Telephone-conference with 0. Shafer
10/08/2015 10/08/2015 10/08/2015 10//1/2015	10 10 10	\$250,00 \$250,00 \$250,00 \$250,00	0.8 \$ 0.5 \$ 0.2 \$	175.00 200.00 125.00 50.00	Analyze legal descriptions Review/analyze-amails from D. Shafer Talechons-conference with D. Shafer Review/analyze-amail from client
10/03/2015 10/08/2015 10/08/2015 10/11/2015 10/11/2015	10 10 10 10	\$250,00 \$250,00 \$250,00 \$250,00 \$250,00 \$250,00	9.8 \$ 9.5 \$ 9.2 \$ 9.6 \$	175.60 200.00 125.60 50.00 150.00	Analyze lagal descriptions Reviewansiyas emails from D. Shafer Telephone conference with D. Shafer Reviewansiyas email from client Ernall disents
10/08/2015 10/08/2015 10/08/2015 10//1/2015	10 10 10	\$250,00 \$250,00 \$250,00 \$250,00	0.8 \$ 0.5 \$ 0.2 \$	175.60 200.00 125.60 50.00 150.00	Analyze legal descriptions Review/analyze-amails from D. Shafer Talechons-conference with D. Shafer Review/analyze-amail from client
10/03/2015 10/08/2015 10/08/2015 10/11/2015 10/11/2015	10 10 10 10	\$250,00 \$250,00 \$250,00 \$250,00 \$250,00 \$250,00	9.8 \$ 9.5 \$ 9.2 \$ 9.6 \$	175.60 200.00 125.60 50.00 150.00	Analyze lagal descriptions Reviewansiyas emails from D. Shafer Telephone conference with D. Shafer Reviewansiyas email from client Ernall disents
10/03/2015 10/08/2015 10/08/2015 10/11/2015 10/11/2015	10 10 10 10	\$250,00 \$250,00 \$250,00 \$250,00 \$250,00 \$250,00	9.8 \$ 9.5 \$ 9.2 \$ 9.6 \$	175.60 200.00 125.60 50.00 150.00	Analyze lagal descriptions Reviewansiyas emails from D. Shafer Telephone conference with D. Shafer Reviewansiyas email from client Ernall disents
10/03/2015 10/08/2015 10/08/2015 10/11/2015 10/11/2015	10 10 10 10	\$250,00 \$250,00 \$250,00 \$250,00 \$250,00 \$250,00	9.8 \$ 9.5 \$ 9.2 \$ 9.6 \$	175.60 200.00 125.60 50.00 150.00	Analyze lagal descriptions Reviewansiyas emails from D. Shafer Telephone conference with D. Shafer Reviewansiyas email from client Ernall disents
10/08/2015 10/08/2015 10/08/2015 10/08/2015 10/11/2015 10/12/2016	10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	9.8 \$ 9.5 \$ 9.2 \$ 9.8 \$ 9.3 \$	175.00 200.00 125.00 50.00 150.00 75.00	Analyzer lagal descriptions Review/analyzer emails from D. Strafer Telephone-conference with D. Strafer Review/analyzer email from client Email disents Analyzer emails from client reparding the serve
10/08/2015 10/08/2015 10/08/2015 10/08/2015 10/12/2015 10/12/2016	10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	9.8 \$ 0.5 \$ 0.2 \$ 0.8 \$ 0.3 \$	175.00 200.00 125.00 125.00 50.00 75.00	Analyze lagal descriptions Review/assigner emiles from D. Stafer Telephone-conference with D. Shafer Review/analyze email from client Ernal disease Analyze emails from client reparding the same.  Ernal C. Resves registeding analysishilly for deposition
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10/08/2015 10/08/2015 10/08/2015 10/11/2015 10/11/2015 10/11/2016 10/11/2015 10/11/2015 10/11/2015	10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	0.8 \$ 0.5 \$ 0.2 \$ 0.8 \$ 0.3 \$ 0.3 \$ 0.7 \$ 0.7 \$ 0.1 \$	775.60 200.00 125.60 100.00 50.00 75.00 75.00	Analyzer lagal descriptions Review/analyzer emails from D. Shafer Telephone-conference with D. Shafer Review/analyzer email from client Email clients Analyzer emails from client reparding the same  Email C. Reserver reparding availability for deposition Review and analysis of hig Beninupicy deci. Review/analyze pleadings filled by NIR, JV and VP
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10/08/2015 10/08/2015 10/08/2015 10/14/2015 10/12/2016 10/12/2016 10/12/2016 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$250.00 \$250.00	0.8 \$ 0.5 \$ 0.2 \$ 0.3 \$ 0.3 \$ 0.3 \$ 0.3 \$ 0.3 \$ 0.3 \$ 0.3 \$ 0.3 \$ 0.4 \$ 0.4 \$ 0.3 \$ 0.7 \$ 0.7 \$ 0.9 \$ 0.7 \$ 0.9 \$ 0.7 \$ 0.9 \$	75.00 125.00 125.00 125.00 150.00 75.00 136.50 275.00 275.00 275.00 275.00 100.00 100.00 75.00	Analyze lagal descriptions  Analyze lagal descriptions  Review/analyze continence with D. Shafer  Telephone-conforence with D. Shafer  Review/analyze small from client  Ernal diserts  Analyze emails from client reparding the same.  Ernal C. Resver-registeing analishbility for deposition  Review and snainsin of his Destruptcy deci.  Review/analyze plandings filed by NIR, JV and VP.  Correspondence with oldert.  Analyze rules of civit procedure and other legal issues  Telephone conforence with S. Haberman  Analyze plandings filed by E. Ng.  Graft notice for client is attend hearing telephonically.  Review/analyze correspondence from clients  Telephone conforence with S. Haberman and B. Kramer
10/08/2015 10/08/2015 10/08/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015 10/14/2015	10 10 10 10 10 10 10 10 10 10 10 10 10 1	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$250.00	0.8 \$ 0.5 \$ 0.2 \$ 0.2 \$ 0.3 \$ 0.3 \$ 0.3 \$ 0.4 \$ 0.4 \$ 0.4 \$ 0.3 \$ 0.7 \$ 0.7 \$ 0.4 \$ 0.4 \$ 0.4 \$ 0.5 \$ 0.7 \$	75.00 25.00 50.00 60.00 75.00 75.00 38.50 275.00 226.00 226.00 226.00 475.00 475.00 475.00	Analyze legal descriptions Reviewanalyze emails from 0. Strafer Telephone conference with 0. Strafer Reviewanalyze emails from client Email clients Analyze emails from client regarding the same  Email C. Review regarding availability for deposition Review and analyzis of hig Benkruptcy deci. Reviewanalyze passdings filed by NIR, IV and VP. Correspondence with othert  Analyze rules of civit procedure and other legal feaces Telephone conference with 6. Haberman Analyze passdings filed by E. Ng. Braft notice for client its attend hearing telephonically.  Reviewanalyze correspondence from clients Telephone conference with 8. Haberman and 8. Kramer Cuttler response
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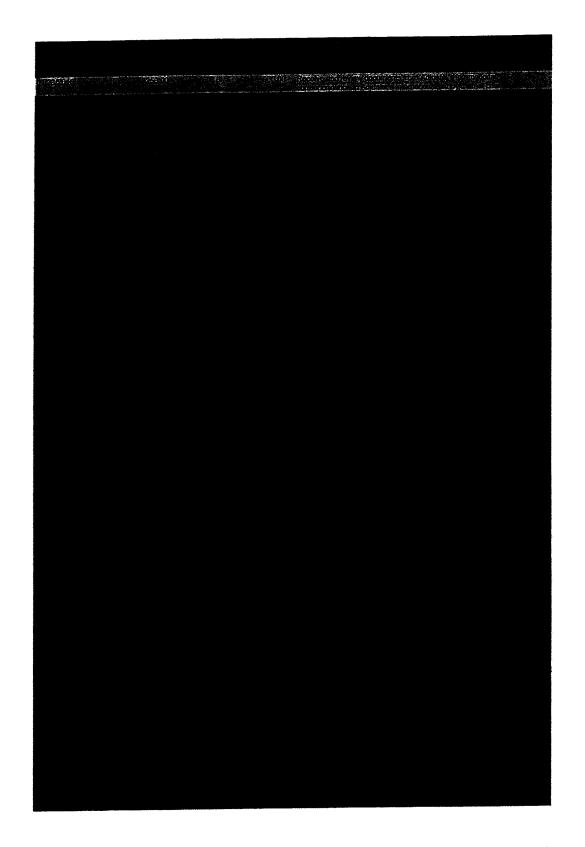
10/15/2015 10/15/2015 10/15/2015 10/15/2015 10/15/2015 10/16/2015	10 10 10 10 10 10	\$250.00 \$250.00 \$250.00 \$250.00 \$250.00 \$195.00	0.6 \$ 0.2 \$ 0.2 \$ 0.3 \$ 2.3 \$ 1.6 \$	150.00 50.00 50.00 75.00 575.00 312.00	Talephone conference with B. Haberman Analyze email from client Talephone conference with M. Hathaway Compile documents and email the same to M. Hathaway
10/18/2015	10	\$250.00	0.6 \$	150.00	
10/16/2015 10/16/2015	10 10	\$250,00 \$250.00	1.1 \$ 0.6 \$	275.00 150.00	
10/16/2015	6	\$270.00	1.9 \$	513.00	
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 noteflown agreement
10/19/2015	10	\$250.00	1.7 \$	425.00	Draft/analyza/edit afficient of 8. Ng
10/19/2015	10	\$250.00	1.1 \$	275.00	Analyze documents related the foregoing reply pleadings
	ing a second second			a street or to	
10/20/2015	15 15	\$195.00 \$195.00	1:1 S 0:2 S	214.50 39.00	Analysis of exhibits submitted by JV and NIRIVP in opp to 3rd SJ Miction Draft Nicholson Dect. Dated: 10/20/15
10202013					
	TO SECTION OF THE SEC				
10/20/2015	6	\$250,00	0.3 \$	75.00	Review/analyze second Ng declaration
10/20/2015	6	\$250.00	0.8 \$	260.00	Prepare status optiate
10/20/2015	6:	\$250.00	411 \$	1,025.00	Begin preparation for hearings on motions for reconsideration and
10/20/2015	10	\$250.00	0.4 \$	190:00	second summary judgment motion 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 cilent responses
10/20/2015 10/20/2015	10 10	\$250.00 \$250.00	0.7 \$ 0.2 \$	175.00 50.00	Draff/analyze/edit changes to B. Ng. Deci: 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 10	\$250.00	0.1 S	25.00	Email the modified agreement to 8. No
	1,-				
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	<b>15</b>	\$195.00	<b>W</b> 3 <b>2</b>	97.50	Research regarding business record exception to hearsey rule
NEWSELF I					
10/22/2015	5	\$250.00	22 \$	\$50.00	Continue preparation for hearings on motions for reconsideration and second summary judgment motion
10/22/2015 10/22/2015	6 10	\$250.00 \$250.00	3 \$ 5,1 \$	750.00 1,275.00	Travel to Sandpoint, Idaho Analizya briefing and prepare for hearing on motion for summary judgment
10/22/2015	10	\$250.00	29 \$	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 10/23/2015	6 8	\$250.00 \$250.00	1 \$ 3 5	250.00 750.00	Telephone conference with clients regarding outcome of hearings 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· 10·	\$250.00 <b>\$250.00</b>	3 \$ 348 \$	750.00 950.00	Travel to and from Spokene, WA to Sandpoint, ID Travel from Spokene, WA to Boise, ID
10/24/2015				450.UU	Reservoir Spokes B. WALD Bose, 12
10/26/2015	15	\$185.00	0.9 \$	175.50	Review mortgages
10/26/2015	6	\$250.00	2.9 \$	725.00	Consepondence with O. Kreifels
10/26/2015 10/26/2015	6 6	\$250.00 \$250.00	0:4 S 0.9 S	100.00 225.00	Review/analyze additional discovery to defendants Research issues regarding tax parcel sales
10/26/2015	10	\$250.00	t.1 \$	275.00	Analyze previously propounded rogs and rips
10/28/2015	10	\$250:00	3.F \$	775,00	Draff/enelyze/edit ripe and rogs to defendants VP, NRR and JV
10/26/2015	10	\$250.00	0.8 \$		Creft/analyze/adit expert witness disclosures
10/26/2015	10	\$250:00	0.4 \$		Coordinate resumes and other information from experts for expert disclosures

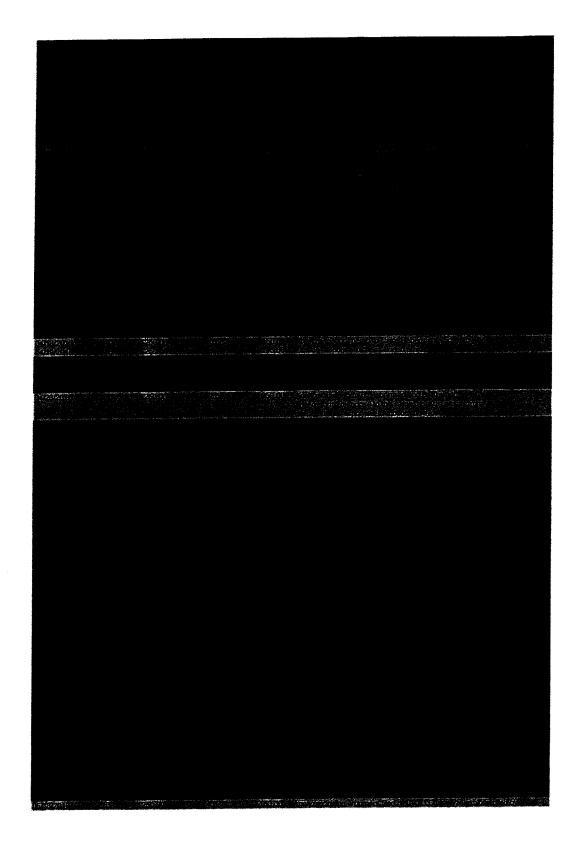
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National State							
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10/28/2015   10   \$250.00   0.8   \$   150.00   Compiled documentation for D. Shafer   10/28/2015   10   \$250.00   1.5   \$   400.00   Analyze smalls from out related from court relations on the same   10/28/2015   10   \$250.00   0.9   \$   225.00   Analyze smalls from client and respond to the same   10/28/2015   10   \$250.00   0.3   \$   75.00   Analyze smalls from client and respond to the same   10/28/2015   10   \$250.00   0.3   \$   75.00   Prepare for conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference call with M. Hathaway and D. Shafer   Participate in conference with G. Edson   Participate in Conference with G.	10/28/2015	10	\$250.00	1.4	\$	350.00	
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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   0.3   \$   75.00   Participate in conference call   10/29/2015   10   \$250.00   0.3   \$   75.00   Email G. Edson   Email G. E	10/29/2015	10	\$250.00				Analyze emails from client and respond to the same
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Recognition filed in R.E. Loans Texas bankruptcy   Review and respond to correspondence-from D. Kreifels		10					
10/30/2015   6   \$250.00   0.8   \$   200.00   Analyze amails and voicemail from G. Edson and leave voicemail in response to the same   11/02/2015   15   \$195.00   2.1   \$   409.50   Analyze amails and voicemail from G. Edson and leave voicemail in response to the same   11/02/2015   15   \$195.00   2.1   \$   409.50   Analyze amails and voicemail from G. Edson and leave voicemail in response to the same   11/02/2015   15   \$195.00   2.1   \$   409.50   Analyze amails and voicemail from G. Edson   11/02/2015   10   \$250.00   0.6   \$   150.00   Telephone conference with G. Edson   11/03/2015   15   \$195.00   0.4   \$   100.00   Telephone conference and email with client   11/03/2015   10   \$250.00   0.8   \$150.00   Analyze analis from M. 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   \$234.00   Analyze analis from M. Hathaway respond to same conference with B. Haberman   11/04/2015   10   \$270.00   1.5   \$   405.00   Telephone conference with B. Haberman   11/03/2015   10   \$250.00   0.9   \$   225.00   Analyze availability and strategy for taking deposition and leave voicemail for D. Marifice regarding deposition dates   11/05/2015   10   \$250.00   0.4   \$   100.00   1.2   \$   100.00   1.2   \$   100.00   1.2   100	10/30/2015	15	\$195.00	0.5	\$	97.50	
10/30/2015   10   \$250.00   2.1   \$   409.50   409.50     409.50     409.50     409.50     409.50     409.50   409.50     409.50     409.50     409.50     409.50     409.50   409.50     409.50     409.50     409.50     409.50     409.50   4	10/30/2015	8	\$250 on	n a	\$	200.00	
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11/02/2015   10   \$250.00   0.4   \$   100.00   Telephone conference and email with client   11/03/2015   15   \$195.00   0.3   \$   \$35.50   \$0.00   \$0.6   \$150.00   \$150.00   \$150.00   \$1.2   \$150.00   \$1.2   \$150.00   \$1.2   \$150.00   \$1.2   \$150.00   \$1.5   \$1.5	11/02/2016	Đ.	\$250.00	1,8	\$	400:00	Contespondence to U. Kreses
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11/04/2015   10   \$270.00   1.5   \$   405.00   Telephone conference with M. Hathaway and D. Shafer regarding same Telephone conference with B. Haberman; telephone conference with B. Haberman and telephone conference with P. DeAngeli regarding deposition dates telephone conference with paralegal for Susan Weeks and G. Finney regarding deposition and leave voicemail for D. Marfice regarding deposition dates telephone conference with paralegal for Susan Weeks and G. Finney regarding deposition belephone conference with P. DeAngeli regarding scope of Lynskey testimony.  11/05/2015						75.00	
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14/05/2015   10   \$250.00   0.9   \$   225.00   Analyze availability and strategy for taking depositions and leave voicemail for D. Marfice regarding deposition dates beliephone conference with paralegal for Susan Weeks and G. Finney regarding deposition and leave voicemail for D. Marfice regarding deposition dates beliephone conference with paralegal for Susan Weeks and G. Finney regarding deposition beliephone conference with P. DeAngeli regarding scope of Lynskey sestimory.  11/05/2015   10   \$250:00   0.3   \$   75:00   Telephone conference with P. DeAngeli regarding scope of Lynskey sestimory.  11/105/2015   10   \$250:00   0.3   \$   75:00   Telephone conference with P. DeAngeli regarding scope of Lynskey and beliephone conference with P. DeAngeli regarding on the deposition of the same and telephone conference with Fidelity and strategy for taking deposition dates beliephone conference with P. DeAngeli regarding scope of Lynskey sestimory.  11/105/2015   10   \$250:00   0.3   \$   75:00   Telephone conference with P. DeAngeli regarding scope of Lynskey and beliephone conference with P. DeAngeli regarding scope of Lynskey and beliephone conference with P. DeAngeli regarding scope of Lynskey and beliephone conference with P. DeAngeli regarding scope of Lynskey and beliephone conference with P. DeAngeli regarding scope of Lynskey settlemory.  11/105/2015   10   \$250:00   0.3   \$   75:00   Telephone conference with P. DeAngeli regarding scope of Lynskey settlemory.  11/10/2015   10   \$250:00   0.3   \$   75:00   Telephone conference with P. DeAngeli regarding scope of Lynskey settlemory.  11/10/2015   10   \$250:00   0.3   \$   75:00   Telephone conference with P. DeAngeli regarding scope of Lynskey settlemory.  11/10/2015   10   \$250:00   0.3   \$   75:00   Telephone conference with P. DeAngeli regarding scope of Lynskey settlemory.  11/10/2015   10   \$250:00   0.3   \$   75:00   Telephone conference with P. DeAngeli regarding scope of Lynskey settlemory.	11/04/2015	10	\$270.00	1.5	*	405.00	
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meand on October 23, 2015						925.00	
	11/11/2015	15	\$195.00	1 \$	5	195.00	
And the second s	11/11/2018		\$250.00	12 \$		200.00	
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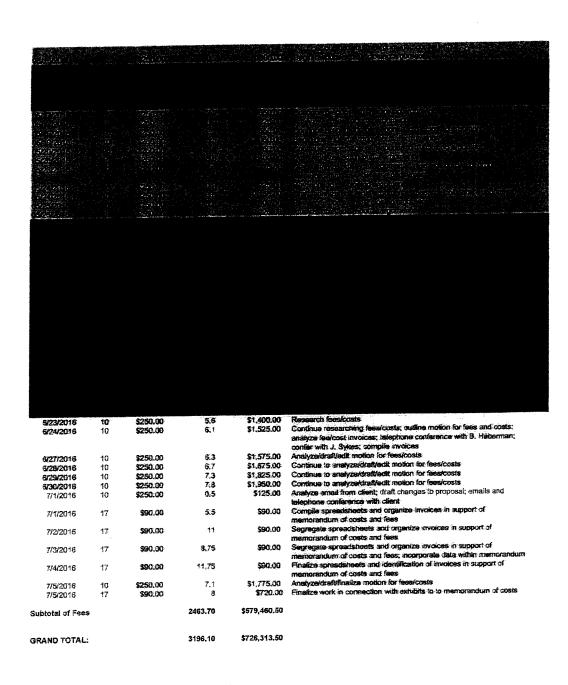












#### **ЕХНІВІТ** В

## Subsection 8-1 GENESIS v. POBO and VALIANT FORECLOSURE Fees Attibuted to JV

Trans Date	Atty	Rate	Hours to Bill	Amount	
03/22/2013 03/26/2013	10 10	\$250.00 \$250.00	0.9 0.9	\$225.00 \$225.00	Analyze project documents and JV, LLC and real property records
04/02/2013	10	\$250.00	0,7	\$175.00	agreement; telephone conference with G. Finney regarding JV LLC
04/45/0040	10	2170.00	1,1	\$187.00	crossclaim and stipulation regarding same Analyze/draft answer to IV, LLC cross claim
04/15/2013 04/15/2013	10	\$170,00 \$170.00	1.1	\$187.00	Analyze JV LLC mortgage, subordination agreements, and other
041;3120:3	1U	\$170.00	F., F	\$107,00	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/adit answer to JV LLC cross claim
04/22/2013	10	\$170.00	0.9	\$153.00	Analyze/draftledit affirmative defenses to JV LLC cross-claim
04/23/2013	10	\$170.00	2.6	\$442.00	Arialyze real property records and analyze/draft/edit stipulation to
04/24/2013	10	\$170.00	0.3	\$136.00	priority of the parties with respect to priority interest of JV, LLC Analyze/draft/edit/finalize answer to JV LLC cross-claims and
04/24/2013	10	\$170.00	8.0	\$136.90	affirmative defenses to same  Analyzeldraft/delit/inalize stipulation to priority of the parties with
04/24/2013	10	\$170.00	0.9	\$153.00	respect to JV, LLC  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	Analyzekirafiedit 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; amail
					cliant regarding the same
09/11/2013	10	\$170.00	0.4	\$68.00	Analyza pleadings from G. Finney, analyze pleadings from court
01/20/2014	10	\$2 <b>50</b> .00	0.9	\$225,00	Talephone 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
01/22/2014	10	\$250.00	0.2	\$50.90	same; analyze small form J. Holley; small J. Holley and R. Distrnica Draft/analyze email to client regarding RE Loans note; smalyze responses to the same
02/11/2014	10	\$250.00	0.4	\$100.00	Analyza pleadings filed by opposing counsel (JV, LLC)
03/11/2014	10	\$250.00	0.3	\$75.00	Braft letter to G. Finney responding to offer of settlement
03/11/2014	10	\$250,00	1	\$250,00	Analyza case documents to prepare respones to letter from G. Finney
03/11/2014	10	\$250.00	8.0	\$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 contenence 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 0.2	\$175.00 \$50.00	Analyze project documents for information necessary to complete letter to G. Finney  Finalize letter to G. Finney
04/18/2014 09/03/2014	10 10	\$250.00 \$270.00	1.3	\$351.00	Analyze email from G. Edson and attachments; draft and analyze
08/03/2014	.0	<i>\$210.00</i>	1.3	<b>\$35</b> 1.00	email to G. Edison regarding documents from G. Filmey, email client regarding some; draft, analyze and edit email to R. Lynstey; email diest regarding some; analyze emails (3) from client; draft and analyze responses to some; confer with pereingal regarding status of summons and deadlines to answer complaint; analyze certificates of service
09/15/2014	10	\$270.00	2.7	\$729.00	Compiler and analyze neal property, records; draft; analyze and edit edit editation to dismiss RC Worst; analyze JV, LLC answer to foreclosure compilarit.
. 09/17/2014	10	\$270.00	2.7		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 .IV, ELC, email client regerding Sage Holdings complaint; analyze response to some
09/18/2014	10	\$270.00	0.6		Analyze memocandum of fees/costs (ited by JV, ELC; draft and analyze order for entry of stipulated judgment against RC Worst; email B: Anderson regarding stiputation to judgment and disclaimer of interest
10/02/2014	10	\$270:00	2.9	\$783.00	Analyzavidrativadit answer to .IV, LLC complaint; analyza email from counsel for the HOA; analyzavidraft/edit response to the same; analyze email from First American ret stiputation to judgment.
10/06/2014	10	\$270.00	1.9		analyze empile from 8. Habermen and respond to the same; analyze email from 8. Kramer and respond to the same; tic 8. Kramer; analyze email from H. Brooks and respond to the same; responding off course issues; analyze JV answer(cross claim
11/11/2014	10	\$270.00	4.1	:	Analyze emails from client: analyze to an documents; draffanolyzefedif email to client regarding same; analyze pleadings fleed by HOA to dismiss JV, LLC's claims; analyze draft slipulation to dismiss; draffedif alipulation to dismiss and email to counsel for HOA; telephone conference with W. Haberman;

			2.5	\$135.00	draft/edit Reeves affidavit Telephone conference with T. McLaughlin regarding changes to
11/14/2014	10	\$270.00	0,5	\$135.00	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
10/04/0044		\$270.00	0.3	\$81.00	Telephone conference with G. Finney regarding JV answer to
12/01/2014	6	\$270,00	0.3	\$57.50	counterclaim, cross-claim and third party complaint
12/02/2014	10	\$270.00	0,6	\$162,00	
					stipulating to extension; analyze email from counsel for HOA
	10	2070.00	3.7	\$999.00	regarding hearing on motion against JV, LLC Draft/analyze reply to JV, LLC's Special Appearance Contesting
12/09/2014	10	\$270.00	3.1	2000.00	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; amail title company; amail counsel for Sage Holding regarding status of stipulation; draft
					stipulation to judgment against Panhandle Management and the HOA;
					analyze amail response from counsel for Sage Holdings; analyze
					liftigation 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 8.
					Anderson regarding status of Sage stip, lifigation guarantee and
					appearance on behalf of HLT and Idaho Independent Mortgage; draft
					letter to court to withhold order for default against idaho Independent
	_		2.7	64 ED 20	Mortgage Correspondence with J. Finney regarding ACI stipulation to entry of
01/26/2015	5	\$250.00	0.6	\$150.00	judgment
01/28/2015	10	\$270.00	0.3	\$81.00	Telephone conference with G. Finney regarding motion for additional
01/26/2015		\$2.0.00			time, SJ response, and discovery responses (.3)
01/28/2015	10	\$279.00	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
04-00-004-5	6	\$250,00	1	\$250.00	Review testimony set forth in Reeves affidavit and discovery requests
01/28/2015 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	5	\$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	5	\$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
22/47/2016	6	\$250.00	1,1	\$275.00	Correspondence with G. Finney regarding discovery and continuance
02/17/2015 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
				\$75,00	and Villelli Telephone conference with G. Finney regarding deposition scheduling
02/23/2015	10 10	\$250.00 \$250.00	0.3 0.2	\$50.00	Analyze email from G. Edson regarding deposition scheduling
02/23/2015 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 Analyze documents in preparation for deposition of R. Villelli
03/02/2015	10	\$250.00	2.7 2.3	\$675.00 \$575.00	Analyze documents and prepare for Beny deposition
03/03/2015 03/03/2015	10 10	\$250.00 \$250.00	1.6	\$400.00	Compile and amail documents requested by JV and telephone
00/00/20:0		420000			conference with counsel for JV regarding the same
03/04/2015	6	\$250,00	5.2	\$1,550.00	Continue preparation of reply memorandum to JV opposition
03/23/2015	6	\$250,00	1.4 0.9	\$350.00 \$225.00	Study JV discovery responses Research JV complaint
03/24/2015 06/16/2015	6 15	\$250,00 \$225,00	0.6	\$135.00	Telephone conference with G. Finney regarding Opposition to Motion
30,10,20,3	,0	<b>9220.0</b> 4			for Entry of Final Judgment and mediation;
					confer with J. Sykes & R. Stacey
06/16/2015	8	\$270.00	0.6	\$162.00	
06/16/2015	10	\$270.00	1.7	\$459.00	Analyze small 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
30, 10,2510		•======			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 2,3	\$50,00 \$575.00	Email client Outline response to JV, LLC motion to reconsider
06/16/2015 06/16/2015	10 10	\$250,00 \$250.00	0.1	\$25.00	Telephone conference with 8. Kramer
06/23/2015	10	\$250.00	0.5	\$125.00	Analyze JV LLC motion that was improperly served in March 2015
07/07/2015	10	\$250.00	1.9	\$475.00	
07/16/2015	10	\$250.00	2.5	\$650.00	Analyze/research motion to reconsider filed by JV  Analyze new motion to reconsider priority of JV, LLC
07/30/2015	10	\$250.00	2.3	\$700.00 \$50.00	
07/30/2015	10 10	\$250.00 \$250.00	9.2 9.1		Analyze responses to the same
07/30/2015 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
	_	****		607E 00	reconsider Review/analyze file and pleadings
07/31/2015	- <b>6</b>	\$250.00 \$270.00	1, <b>5</b> 1,1	\$375.00 \$297.00	Analyze email from client and respond to same;
07/31/2015	10	J210.00	3.1		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	0.6	\$150.00	
08/04/2015	10	\$250,00	1,1	\$275.00	
08/04/2015	10	\$250.00	1.3	\$325.00	
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 60 standard; finalize memo; finalize motion
08/19/2015	6	\$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
	10	\$250.00	2.7	\$675.00	response to the same Legal research in support of opposition to motion to reconsider
08/21/2015			2.5	\$650.00	Begin analyze/drafting the same
08/21/2015	10	\$250,00		\$350.00	
08/24/2015	10	\$250.00	1.4		
08/24/2015	10	\$250.00	1.5	\$375.00	
08/24/2015	10	\$250,00	1	\$250.00	
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	8,2	\$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, !	\$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, after 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,
00/3/1/20/3		<b>J</b>			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
09/01/2015	9	\$200,00	Ų.U	4400.40	reconsideration
		*DED 30	0.5	\$125.00	Analyze JV's request for hearing transcript
09/08/2015	10	\$250,00	0.5		Analyze court's memorandum decision and order granting JV's motion
09/08/2015	10	\$250,00	1.3	\$325.00	to reconsider in part and denying it in part
			0.4	\$600.00	Analyze court memorandum decision and pleadings for and against JV
09/09/2015	10	\$250.00	2.4	4000.00	motion to reconsider
				2075.00	
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		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
10/07/2013		2200,00			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	\$250.00	1.1	\$275.00	Analyze/draft/edit interrogatories to JV
10/08/2015				\$400.00	Finalize discovery requests to JV
10/09/2015	10	\$250.00	1.6		Analyze JV's motion for summary judgment and supporting affidavils
10/14/2015	10	\$250,00	1,5	\$375.00	
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	<b>\$5</b> 8.50	Analysis of Berry Affid Opp 3rd SJ Motion
10/18/2015	15	\$195.00	8,0	\$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	
10/20/2015	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/analzye/edit/research reply to objection filed by JV, LLC
10.20.2	10	\$250.00	1,7		Analyze purchase money mortgage
10/20/2015		\$250.00	1,1		Analyze possible statute of limitations issues
10/20/2015	10			\$234.00	Reply to JV's Opp to Valiant's First Motion to Strike
10/21/2015	15	\$195.00	1.2 1.9	\$475,00	Analyze last minute briefing filed by opposing counsel with affidavits
10/21/2015	10	\$250.00	1.9	3413.00	and motions to shorten time
10/21/2015	18	\$100.00	1,1	\$110.00	
10/2 1/2015	.5	<b>\$</b> 140.00			Exemption
10/26/2015	15	\$195.00	2.5	\$507.00	Analysis of JV discovery responses and draft meet and confer
10/27/2015	10	\$250.00	0.2	\$50.00	Analyze amail 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
1112472010	10	4.00.00			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/adit 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	8,2	\$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	00.002	with C. Nicholson regarding research; email to B. Ng; analyze documents produced by C. Reeves; confer with J. Sykes regarding Reeves and Brule depositions; analyze deposition exhibits; otherwise prepare for Irial Receive and review documents from Adjuster's International;
01/23/2016	9	\$2.50.00	3.0	4300.00	correspondence to Adjuster's International; study JV trial brief
04/18/2016	10	\$250,00	0.6	\$150.00	Analyze molion/memo to strike Haberman affidavit by JV
04/19/2016	10	\$250.00	1.1	\$275.00	Outline response to JV motion to strike
04/23/2016	10	\$250,00	2.6	\$650.00	Analyze mails form 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; autline 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 loutline 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 rebuttel arguments
05/23/2016	10	\$250.00	7.1	\$1,775.00	Draft /analyze/edit :egal 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	Braft /analyze/edit legal arguments; research collateral assignment
05/25/2016	5	\$250,00	3.8	\$900.00	Revise response to JV closing argument
05/25/2016	10	\$250.00	8.9	\$2,225.00	Analyze draft/edit rebuttal arguments
Subtotal of Fees	s		282.50	\$68,863.50	

## Subsection 8-2 VALIANT FORECLOSURE Fees Attibuted 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	9,3	\$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 lrogs 13-23 and RFPs 7-20 (0.1); review of NIR Answers to lrogs 13-23 and RFPs 7-20 (0.1)
11/16/2015	10	\$250.00	1.6	\$400.00	Analyze Sandpoint Title documents;
11(74)44		*******			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 avaluation of possible mediation options
11/18/2015	10	\$270,00	2,3	\$621.00	Analyze complaint filed against interests of RE Loans, MF08 and
					Pensco Trust; draft amail to First American;
					draft email to Fidelity; analyze
					amails 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
11/25/2015	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 amail to opposing counsel regarding discovery
					responses; draft/analyze and adit emails to C. Reeves and B. Ng regarding depositions; draft/analyze/edit email to D. Martice regarding
					First American deposition; draft/analyze/edit protective order; amail the
					same to opposing counsel
12/14/2015	5	\$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; amail S. Weeks and G. Finney

					regording confidentiality agreement
12/04/2015	10	\$250.00	1.9	\$475.0	
12/07/2015	10	\$270.00	1.5	\$432.00	
12/07/2015 12/07/2015	6 10	\$270.00 \$250.00	0.8 0.8	\$216.00 \$200.00	Analyze email from client; email opposing counsel canceling deposition of C. Reeves; analyze email from G. finney regarding
12/08/2015	10	\$250,00	2.6	<b>\$650.00</b>	confidentiality agreement; analyze supplemental expert withess disclosure; latephone conference with 3. Sawyer regarding documents; amalyze analyze email from Mr. Hathaway and respond to same Analyze amail from Mr. Hathaway; analyze client documents;
12/09/2015	10	\$250,00	4.1	\$1,025.00	agreement and Vellant documents (0.6); analyzalidentify consulting agreement and consent to judgement (1.1);
	_	****	2.5	*****	analyze email from client (0,3); analyze client documents (2.1)
12/09/2015 12/10/2015	6 10	\$250,00 \$250,00	2.9 3.3	\$725.00 \$75.00	
12/11/2015	10	\$250.00	3.3	\$825.00	
12/11/2015	6	\$250.00	0.3	\$75.00	
12/13/2015 12/14/2015	10 10	\$250.00 \$250.00	3.9 2.9	\$975.00 \$725.00	
					availability; analyze email from Fidelity; analyze Sage Holdings' daims
12/14/2015 12/15/2015	15 15	\$195.00 \$195.00	7.6 5	\$1,482,00 \$975,00	
			_		draft Declaration of RLS
12/16/2015 12/18/2015	10 10	\$250.00 \$250.00	5.2 3.1	\$1,300.00 \$775.00	
12/18/2015	8	\$250.00	1.8	\$450.00	
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, Nichotson regarding trial deadthres for briefing; compile FATCO documents; email the same to Streamline imaging; arrial D. Marfice regarding FATCO deposition; analyze filing deadlines for replies to oppositions to molions in Limine and rules regarding the
12/22/2015	10	\$250.00	5.2	\$1,300.00	same; analyzeifdomittyl and compile trial soliibits; edit titigation outlines Analyze letter from First American; analyzeidettdraft amail is cilients; analyze client response; analyze C. Reeves documents;
12/28/2015	10	\$250.00	3.3	\$825.00	draft deposition notices for R. Lynskey and C. Linscott Confer with C. Nicholson regarding nearing; analyze armsi from client; respond to same; telephone conference with clients; emails to opposing counsel regarding availability of expent for deposition
12/28/2015	15	\$195.00	4.6	\$897 00	Philish drafting response in support of mollion in Limine regarding VP/NRR (3.4), draft response in support of mollion in Limine regarding UV (1.2)
12/28/2015	6	\$250.00	1.1	\$275.00	Review and revise motion in limme reply memoranda
12/29/ <b>2</b> 015	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. Enscott and R. Lynskey; analyze response to the same; draft deposition notices for C. Reeves and B. Ng; analyze/edit casemap outfless
12/29/2015	15	\$195.00	11	\$2,145.00	Preparation for (1.5), travel refrom (8.4, and attend (1.3) motion in Limine reacting
12/36/2015	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 calender and email S. Weeks availability for depositions through dates; emails to and from Streamber 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	5	\$250.00	2.2	\$550.00	Review correspondence from D. Penny; begin trial preparation; research evidence issue; confer with R. Stacey, reparting trial preparation.
12/31/2015	10	\$250.00	5.2	<b>\$</b> 1,300.00	Continue to identify FATCO documents that need to be blown up for trait; analyzeridentify trait autistitis; draftferitisralyze casemap outlines in preparation for trial; analyze court order regarding motions in ilmine; confer with C. Nicholson regarding the same
01/04/2016	5	\$250.00	0.6	\$150.00	Begin preparation for deposition of C. Reeves
01/04/2016 01/05/2016	10 6	\$250.00 \$250.00	9.7 1.1	\$2,425.00 \$275.00	Analyze/draft/edit exhibit fist and compile and analyze trial exhibits Review and revise trial exhibit list
01/05/2016	10	\$250.00	3.7	\$925,00	Analyza/identify/compile deposition exhibits; analyza/edit trial exhibit (lat

01/06/2016	6	\$250.00	1.2	\$300.00	Continue preparation for deposition of C. Reeves  Outline questions and otherwise prepare for depositions of C. Linscott
01/06/2016	10	\$250.00	6.3	\$1,575,00	and R, Lynskey; telephone conference with clients
01/07/2016	6	\$250.00	0.4	\$100.00	
01/07/2016	5	\$250.00	0.9	\$225.00	Multiple correspondence with C. Reeves
01/07/2016	6	\$250.00	1.9	<b>\$</b> 475.00	Continue preparation for C. Reeves deposition
01/07/2016	8	\$250.00	0.9	\$225,00	Review amended notices of deposition of Reeves and Ng Travel to Sandpoint, idaho (4.1); attend and participate in depositions
01/07/2016	10	\$250.00	10.7	\$2,675,00	of C. Linscott and R. Lynskey (5.3); travel to spokane, WA. (1.3)
01/08/2016	9	\$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;
01100/2010	, ,	0200111			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
		****		\$525.00	topics; analyze and edit irial exhibit list and trial exhibits Research/analyze wrap mortgages
01/09/2016	10	\$250.00	2.1 5.7	\$1,425.00	Analyze exhibits and exhibit lists; analyze/identify
01/10/2016	10	\$250.00	0.7	\$1,125,30	all recorded documents to obtain certified copies; analyze exhibits and
					prepare for deposition of 3. Ng
01/11/2016	8	\$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
01111120		*			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 S. Ng; edit/analyze exhibit list; travel to Oakland, CA, for deposition
		****	0.2	\$30.00	Pull Law Review Articles
01/11/2016	18	\$100,00 \$195,00	0.3 1.5	\$292.50	Discuss deposition A. Brule;
01/12/2016 01/12/2016	15 10	\$250.00	11.6	\$2,900.00	Attend and participate in deposition of B. Ng; travel from Oakland, CA
091222010	70	\$255.00			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 dos; articles of org; and
		#CED 08		<b>\$0</b> .00	self-authentication; email regarding research Continue preparing for A, Brule and C. Reeves depositions; travel to
01/12/2016	6	\$250.00		\$0.00	CDA idaho
01/13/2016	10	\$250.00	4,8	\$1,200,00	Telephone conference with B. Haberman and B. Kramer;
01713/20:3			.,-		confer with J. Sykes; analyze depc 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
	-	CCEO 20		\$0,00	Continue prep for Brule deposition; continue prep; travel to
01/13/2016	6	\$250,00		30,50	Spokane; telephone conference with clients
01/14/2016	10	\$250.00	4.3	\$1,200.08	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. Marfice regarding the same; analyze/adit/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
	_	COEO OO	4	\$1,000.00	Return to Boise
01/16/2016 01/16/2016	6 6	\$250.00 \$250.00	1	\$250.00	Correspondence to obtain documents re insurance
91/18/2016	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;
				2070 00	telephone conference with Wetls 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;
31/20/2010		0.0000			research regarding legally operative fact exception
01/20/2016	ទ	\$250.00	7.2	\$1,800.00	Letter to D. Penny; telephone conference with Chuck Reeves;
					review document from C. Reeves; update trail exhibits; revise trial brief; review JV Exhibit List and VP
					Exhibit List; lelephone conference with Greenspain/Adjuster's
					International
01/21/2016	10	\$250.00	7.9	\$1,975.00	Meeting with J. Sykes; analyze documents and amend
0112112010	. •			,	exhibit lists; analyze rules of evidence; analyze VP documents;
					telephone conference with D. Kreitman;
					confer w C. Tipton; email H. Spector; analyze response
		*400.00	2.3	\$290.00	research untruthful acts subject to extrinsic evidence Research legally operative fact; research
01/21/2016	18	\$100,00	2,9	\$2 <b>5</b> 0.00	IRE 303(15); amail/phone call regarding affidavit
01/21/2016	5	\$250.00	5.3	\$1,325.00	Review and revise documents; create new trial exhibits;
GHE DEVIO	•				revise trial brief
01/22/2016	10	\$250.00	6,5	\$1,650.00	Analyze deposition transcripts; compile documents/exhibit binders to

					ship to Sandpoint; identify aquipment to ship to Sandpoint; confer with IT company regarding the same; analyze amail from H.
					Spector; confer with C. Tipton; analyze deposition exhibits
01/22/2016	ô	\$250.00	6.3	\$1,575,00	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
	40	\$250.00	6,7	\$1 675.00	Prepare for trail
01/24/2016	10 18	\$250.00 \$100.00	0.4	\$40.00	E-mail regarding cross complaint; follow-up records affidavit
01/24/2016 01/24/2016	5	\$250,00	3.9	\$975,00	Trial preparation; prepare new exhibit 65; lelephone conference with Chuck Reeves; prepare direct exam of Chuck Reeves
01/25/2016	15	\$195,00	0.7	\$136,50	Orait memoranda of law
01/25/2016	10	\$250.00	9.8	\$2,450.00	Prepare for Irial
01/25/2016	8	\$250.00	4.2	\$1,050.00	Continue trail preparation; review Deeds of Trust; finalize Exhibit 65A; conference with P. DeAngeli
01/26/2016	10	\$250.00	13.1	\$3,275.00	Travel from Boise to Sandpoint; telephone conference with client; analyze exhibits and direct testimony; trial preparation
01/26/2016	6	\$250.00	14	\$3,500.00	Travel to Sandpoint, Ideho; trial preparation
01/27/2016	15	\$195.00		\$0.00	Deal with original exhibit issues (1.4); review VP's Motion to Amend Meeting with B. Ng; meeting with C. Linscott; meet with client;
01/27/2016	10	\$250.00	14.3	\$3,575.00	otherwise prepare for trial
01/27/2016	3	\$250.00	10.5	\$2,625.00	Trial preparation; prepare trial examination; telephone call to witness identified by JV and VP; meet Bill Haberman
01/28/2016	15	\$195.00	3.4	\$663,00	Research and revise memoranda regarding depositions and res judicata affect; review loan documents
01/28/2016	10	\$250.00	14.7	\$3,675.00	Attend trial; argue opposition to motion to amend;
0 112012013		*			prepare for opening statements; meet with witness; meet with witness; trial preparation
01/28/2016	ô	\$250.00	12.5	\$3,125.00	Trial preparation for second day of trial
01/29/2016	15	\$195.0G	1.5	\$292.50	Review documents; review Finney offer to purchase; telephone conference with and email to Phil DeAngeli
01/29/2016	10	\$250,00	9.3	\$2,450.00	Prepare for trial; attend trial; redirect examination of B. Ng; direct
					examination of C, Linscott; redirect examination of C, Linscott
01/29/2016	6 10	\$250.00 \$250.00	11 3.9	\$2,750.00 \$975,00	Second day of trial  Box exhibits, documents, binders, etc and mail to Boise, ID; travel from
01/30/2016	10	\$250.00	<b>J</b> .3	90,000	Sandpoint to Boise, ID
01/30/2016	6	\$250.00	7	\$1,750.00	Meet with Bill Haberman; travel to Boise
02/01/2016	10	\$250.00	4,1	\$1,025.00	Analyze status of trial; telephone conference with D. Penny
02/01/2016	8	\$250.00	0.2	\$50.00	Telephone conference with D. Penny
02/04/2016	10	\$250.00	3.1	\$775,00	Analyze boxes from Sandpoint and verify everything was received from UPS
02/05/2016	10	\$250.00	2.1	\$525.00	Analyze email from client and respond to the same; analyze trial
02/05/2016	6	\$250.00	0,5	\$125.00	notice; outline issues for an redirect Correspondence with D. Penny; correspondence with court reporter
			2.1	\$525.00	and counsel regarding transcript  Analyze pleadings for potential default issues; analyze email from client;
02/08/2016	10	\$250.00			draft/analyze response to same; confer with J. Sykes
02/08/2016	5 10	\$250.00 \$250.00	0. <b>3</b> 6.1	\$200.00 \$1,525.00	Correspondence regarding chain of title Analyze email from client;
02/16/2016	,0	9230.00	<b>3.</b> 1	Ψησεισσ	analyze email and letters from First American; analyze/draft email to P. DeAngelf; 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	3	\$250.00	4,4	\$1,100.00	Study Eagle Pointe deeds Prepare trial testimony; correspondence with C. Reeves;
03/01/2016	6	\$250.00	4.2	\$1,050.00	correspondence to P. DeAngeli; review Eagle Points documents
03/01/2016	10	\$250,00	3,1	\$775.00	Analyze amails from client and respond to the same; analyze documents; analyze Eagle Pointe issues; analyze FATCO 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	š	\$250.00	2,1	\$525.00	Prepare additional documents for review
03/07/2016	8	\$250.00	2.3	\$75,00	Review correspondence from client Prepare for trial
03/07/2016	10	\$250.00	5.2 2.9	\$1,300.00 \$725.00	Prepare for trial
03/08/2016 03/09/2016	10 18	\$250.00 \$100.00	1.6	\$160.00	Research paving down of lien
03/09/2016	10	\$250.00	4.9	\$1,225.00	Prepare for trial
03/10/2018	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 Irial
03/11/2016	10	\$250.00	5.1	\$1,275.00	Prepare for trial Prepare for and attend telephone conference with C. Reeves
03/12/2016	6 10	\$250.00 \$250.00	2.1 4.3	\$525.00 \$1,075.00	Prepare for trial
03/12/2016 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	\$1,875.00	Prepare for trial Travel to Sandpoint and prepare for trial; interview C. Reeves
03/15/2016	- 5 - 10	\$250.00 \$250.00	12 14.1	\$3,000.00 \$3,525.00	Travel to Sandpoint, ID from Boise, ID; meet with B. Haberman;
03/15/2016	10				meet with C. Reeves; prepare for Irial
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	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
	10	\$250.00	3,2	\$800.00	Analyze/outline trial testimony: confer with J. Sykes
03/21/2016	6	\$250.00	0.1	\$25.00	Telephone conference with D. Penny
03/28/2016		\$250.00	0.2	\$50.00	Correspondence with D. Penny
03/30/2016	6		1.5	\$400.00	Analyze/draft rough outline for closing argument
04/01/2016	10	\$250.00	6,4	\$1,600.00	Begin analysis of admitted achibits for closing arguments; begin legal
04/04/2016	10	\$250.00	G, <del>4</del>	\$1,000,00	research in support of closing argument; begin-outlining closing argument
**(DE)**********************************	10	\$250.00	1.4	\$350.00	Continue analysis exhibits
04/05/2016		\$250.00 \$250.00	5,5	\$1,625.00	Analyze/editifinalize written closing argument
04/11/2016	10	\$250.00	7,1	\$1,775.00	Draft/analyza/adit written closing argument; analyze admitted exhibits
04/12/2016	10		6.8	\$1,700.00	Draft/analyze/edit written closing argument; analyze admitted exhibits;
04/13/2016	10	\$250.00	3.0	<b>4</b> .,. <b>4</b>	research legal issues; analyze/draft/finalize affidavit of B. Haberman; analyze spreadsheets;
					analyze/draft amail 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;
04/4/2010	10	5203177			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:
04/22/2010	,0	0000.00			verify all lots described in Exhibit 30; email Bonner County tax
					assessor; analyze emails from D. Shafer
	40	\$250.00	3.1	\$775,00	Analyze information from D. Shafer;
04/25/2016	10	\$200.00	0.1	ψ,, σ,οο	analyze trial exibihits; telephone conference with C. Piehl;
					email to C. Piehl: analyze response to same;
					analyze fit guarantee; analyze/draft ameli to C. Plahi;
					analyze notice from Supreme Ct. re: datas for Treate Creek hearing;
					email same to clients
				8475.00	Analyze email and attachments from C. Piehl; email D. Shafer,
04/26/2015	10	\$250,00	1.9	\$475.00	analyze email from D. Shafer, email D. Shafer, analyze email
					from B. Haberman
04/27/2016	10	\$250.00	2.9	\$725.00	Analyze amails 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	\$200,30	Analyze amail from D. Shafer;
04/20/20:0		*******			telephone conference with D. Shafer;
					analyze amail from the court; email to client
04/20/2016	10	\$250.00	0,4	\$100.00	Analyze order from Court denying motions to strike Haberman affidavit
04/29/2016	U	\$2.00.00	0.0	*	and attachment; analyze email from client
05/00/0046	10	\$250.00	4.4	\$1,100.00	Prepare for drafting final judgment by analyzing properties subject to
05/02/2016	10	32,00,00		***************************************	RE Loans, Pensco and MF08 mortgages; identify properties subject
					only to RE and the Redemption Deed, properties only subject to
					Perisco 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 draffedit email to C. Pierii; analyze email from D. Shafer
05/09/2016	10	\$250.00	1,9	\$475,00	Analyze email from D. Shafer, analyze parcel aprendaheat and lot
00/00/20					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;
0011012010					analyze emails from D. Shafer and M. Hathaway
05/11/2016	10	\$250.00	0.6	\$150,00	Analyze amail from client; telephone conference with client
	5	\$250.00	0.7	\$175.00	Review correspondence from W. Haberman
05/12/2016	6	\$250.00	3.3	\$825.00	Review closing arguments of JV and VP; research issues;
05/13/2016	u	WESU.00	V	2020,00	correspondence from B. Kramer
05/26/2016	6	\$250.00	1.2	\$300.00	Correspondence to clients
		\$250.00	6.2	\$1,550.00	Analyze lecit/finalize retruttal arguments; analyze emails from clients
05/26/2016	10	\$250,00	2.2	\$550.00	Review Court's Memorandum Decision; telephone conference with
05/27/2016	5	9230,00		2000.00	clients
		¢ocn on	2.8	\$700.00	Analyze memorandum decision and order from Bonner County Court;
05/27/2016	10	\$250.00	4.0	41.00.00	confer with J. Sykes; telephone conference with clients;
					email D. Penny; analyze response
	_	4050	0.7	\$125.00	Telephone conference with clients
05/31/2016	6	\$250.00	0.5		Analyze emails from clients; respond to same;
05/31/2016	10	\$250,00	4.4	\$1,100.00	
					research post-decision motions;
					draft judgment and order of sale
6/8/2016	10	\$250.00	0.4	\$100.00	Analyze amail from client; respond to the same; confer with C. Tipton
	10	\$250.00	9.1	\$2,275.00	Draft/analyze/edit judgment and decree of foreclosure
8/9/2016	10		8.2	\$1,550.00	Finalize proposed judgment and foreclosure decree; outline
	10	\$250.00	٧.٠		
8/9/2016		\$250.00	V.2		motion for proposed order of sale; research marshalling doctrines;
8/9/2016 8/13/2016		\$250.00 \$250.00	7.2	\$1,800.00	Analyze disaster clean-up issues; telephone conference with court clerk;
8/9/2016	10			\$1,800.00	Analyze diseater clean-up issues; telephone conference with court clerk; analyze/edil/draft changes to judgment and foreclosure decree;
8/9/2016 8/13/2016	10			\$1,800.00	Analyze diseater clean-up issues; telephone conference with court clerk; analyze/edil/draft changes to judgment and foreclosure decree; forward the same to clients; continue research;
8/9/2016 8/13/2016	10			\$1,800.00	Analyze disaster clean-up issues; telephone conference with court clerk;

6/21/2016 6/22/2016	10 10	\$250.00 \$250.00	6.7 7 8	\$1,675.00 \$1,950.00
Subtotal of Fees	;		794.90	\$192,557.50
JV's Pro Rata Si	are	50.0%	397.45	\$96,278.75

Subsection 8-3 GENESIS v. POBD Case No. CV 09-1810

Case No. CV	09-7870
Fees Attibuted Jointly	y to NIR and JV

Trans Date	Atty	Rate	Hours to Bill	Amount	
10/29/2012	15	\$190.00	4.5	\$874.00	Compare legal descriptions among lawsuits
10/29/2012	10	\$250.00	0.9	\$225,90	Litigation strategy meeting with C. Nicholson regarding identification of properties subject to cross-claims in case
10/30/2012	15	\$190.00	1.5	\$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 line 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	Analyza 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 amail from F. Elsaesser and forward and amail client regarding the same; leave voicemail for opposing counsel regarding purchase of note
05/14/2014	10	\$250,00	0.3	\$75.00	Talephone conference with S. Weeks regarding sale of note
Subtotal for F	ees		15.70	\$3,297.00	
JV's Pro Rata	Share	50.0%	7.85	\$1,648.50	

Analyze/draft/edit memorandum in support of motion for order of sale Analyze/draft/finalize memo/motion for proposed order of sale; analyze/draft/finalize proposed order of sale

#### Subsection B-4 VALIANT FORECLOSURE Fees Attibuted Jointly to NIR, VP, and JV

			10 /11/4 .	. 1	
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. McLaughtin 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 illigation guarantee; email client
09/17/2014	5	\$160,00	0.5	\$96.00	Sludy matrix for deadlines; revise same
10/97/2014	10	\$270.00	3.1	\$837:00	Analyza/draft/edit affirmative defenses to JV cross claim; analyze/edit answer to JV, LLC claims; analyze motion filed by VP, LLC; 4c J, Breaux re: golf course; 4c and emails with client; confer wf J. Sykes
10/08/2014	6	\$160.00	0.6	\$96.00	Strategy conference with R. Slacey
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	5	\$270.00	6.4	\$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	š	\$270.00	3.2	\$864.00	Continue study of real property records
12/08/2014	8	\$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

					- · · · · · ·
12/11/2014	6	\$270.00	3.1	\$837.00	Panhandle Management Research legal arguments for summary judgment motion and
12/11/2014	0	#270.00	3.1	40.57.00	supporting pleadings
12/12/2014	6	\$270.00	2.2	\$594.00	
1014718414	~	# <b>5</b> 70.00	79. 2	#4 ann ar	pleadings; legal arguments
12/15/2014	6	\$270.00	7.4	\$1,998.00	<ul> <li>Continue preparation of summary judgment; revise statement of facts and legal argument</li> </ul>
12/16/2014	10	\$270.00	2.4	\$648.00	
					analyze project documents; analyze legal description
12/16/2014	8	\$270.00	2.1	\$567,00	
12/16/2014 12/17/2014	6 6	\$270.00 \$270.00	4,2 6	\$1,134,00 \$1,620.00	
127112011	•	***************************************	-	11,020,00	pleadings; telephone conference with J. Hamilton;
					study real property records
12/22/2014 12/30/2014	10 6	\$270.00 \$270.00	0,6 3,4	\$162.00 \$918:00	
12/30/2014	6	\$270.00	3,2	\$864,00	
					admission to propound upon JV, North Idaho Resorts and VP
01/05/2015	6	\$270.00	0.9	\$243.00	•
01/05/2015 01/05/2015	6 6	\$270.00 \$270.00	3_1 1,2	\$837.00 \$324.00	
01/06/2015	10	\$270.00	0,4	\$108.00	
01/09/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes regardoing summary judgment issues
01/09/2015	6	\$270.00	3.9	\$1,053.00	
01/12/2015	đ	\$270.00	5.2	\$1,404,00	judgment Revise summary judgment memorandum; study Union Bank case
01/12/2015	8	\$270.00	0,3	\$81,00	Telephone conference with D. Shafer
01/13/2015	8	\$270.00	3,3	\$891.00	Continue drafting summary judgment memorandum and supporting
0414470046	^	P070 00	F	## BEO 00	pleadings
91/14/2015	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	5	\$270.00	3.5	\$945.00	Telephone conference with client; final summary judgment pleadings
01/16/2015 01/20/2015	6 6	\$250,00 \$250,00	2.9 3.2	\$725,00 \$800,00	
01/20/2015	6	\$250,00	1.3	\$325.00	
01/21/2015	6	\$270,00	0.6	\$162.00	Telephone conference with D. Shafer
01/21/2015	5	\$250.00	2.7	\$675.00	Review and revise discovery requests to JV, NIR and VP
01/22/2015 01/23/2015	6 6	\$250.00 \$250.00	0.5 2.5	\$125,00 \$625.00	Correspondence with clients  Revise discovery requests [interrogatories, requests for production and
3 (. Lui Lo ; o	•	4200.00		4020,00	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 02/03/2015	18 10	\$100.00 \$270.00	3.8 0.4	\$380.00 \$108.00	Research requirements related to clubhouse
02/04/2015	18	\$100.00	4,1	\$410.00	Confer with J. Sykes regarding illigation 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 10	\$100,00	3.9	\$390.00	Draft research memorandum
02/06/2015 02/09/2015	6	\$270.00 \$250.00	0.6 0.9	\$162.00 \$225.00	Analyze emails from client and confer with J. Sykes regarding same Prepare stipulation to reschedule summary judgment hearing
02/12/2015	8	\$250.00	0.2	\$50,00	Correspondence with S. Weeks and G. Finney regarding possible
	_				settlement conference
02/13/2015 02/18/2015	6 6	\$250.00 \$270.00	0.9 2.6	\$225.00 \$702,00	Correspondence with clients
02/10/2015	0	\$270.00	2.0	\$102,00	Correspondence with client; review plat map; telephone conference with D. Shafer
02/19/2015	8	\$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 amails from client and analyze/draft responses to the
02/23/2015	10	\$250.00	2.1	\$525.00	same Review/analyze memorandums filed in opposition to client's motions
02)23(2013	10	\$230.50	2.1	4020.00	for summary judgment
02/24/2015	6	\$250.00	4.2	\$1,050,00	Continue preparation of reply memoranda to summary judgment
20/04/20045	_	4070.00	2.0	****	oppositions by JV, NIR and VF
02/24/2015 03/03/2015	6 6	\$270.00 \$250.00	2,2 2,3	\$594.00 \$700.00	Prepare letter to Fidelity Prepare correspondence to Fidelity
03/11/2015	8	\$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	ପ 6	\$270,00	9,3	\$81.00 \$300,00	Correspondence with D. Shafer regarding expert issues
03/13/2015 03/16/2015	6	\$250,00 \$250,00	1,2 0,7	\$175.00	Telephone conference with B, Kramer and W. Haberman Continue preparation for hearing on summary judgment motions
03/16/2015	10	\$250.00	0.6		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 03/16/2015	10 6	\$250,00	0.6 2		Analyze documents from D. Shafer Appear for/attend hearing
03/16/2015	6	\$250.00 \$250.00	0.2	\$500.00 \$50.00	Telephone conference with D. Shafer
03/16/2015	6	\$250.00	0,5		Raview/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		Prepare for and attend meeting with D. Shafer regarding expert issues
03/16/2015 03/16/2015	10 6	\$270.00 \$270.00	0,5 0,2		Analyze documents from D. Shafer Telephone conference with D. Shafer
03/16/2015	đ	\$270.00	0.5	\$135.00	Review/analyze documentation prepared by D. Shafer
03/17/2015	10	\$250.00	0.2		Telephone conference with B. Anderson regarding status of hearing
03/17/2015	6	\$250.00	3.5		Travel to Spokane, Washington for summary judgment hearing
03/18/2015	6	\$250.00	6,5		Travel to Sandpoint, Idaho for summary judgment hearing and return to Spokane, Washington
03/18/2015	6	\$250.00	3,2		Prepare for summary judgment hearing
03/18/2015	6	\$250.00	0.7	\$175.00	Telephone conference with clients following summary judgment

20/40/0045		\$250.00	3.5	\$875,00	hearing Return to Boise, Idaho from Spokane, Wasnington
03/18/2015	6		0.2	\$50.00	Review and respond to correspondence from W. Haberman
03/19/2015	6	\$250.00	2.1	\$525.00	Review correspondence from and telephone conference with D. Shafer
03/23/2015	6	\$250.00		\$567.00	
03/23/2015	6	\$270.00	<b>2.</b> 1 <b>1.</b> 1	\$297.00	
03/24/2015	6	\$270.00	1.1	φ <b>23</b> 7. <b>0</b> 0	telephone conference with S. Nieman
	_	\$270.00	1.8	\$486.00	Correspondence with D. Shafer regarding expert issues;
03/24/2015	6	\$270.00	1.0	3400.00	correspondence with clients regarding same
	_	**** ***	2.0	\$225.00	Correspondence with D. Shafer
03/24/2015	5	\$250.00	0.9 0.6	\$150.00	Review matrix of properties
03/24/2015	5	\$250.00		\$75.00	Correspondence with dients
03/24/2015	3	\$250.00	0.3 0.2	\$50.00	Telephone conference with D. Shafer
03/25/2015	5	\$250.00	0.7	\$189,00	Correspondence with B. Kramer; telephone conference with J. Miller;
03/25/2015	5	\$270.00	ULF.	\$108,00	telephone conference with S. Nieman
	_	#C70.00	0.2	\$54,00	Telephone conference with D, Shafer regarding expert issues
03/25/2015	6	\$270.00		\$243.00	Telephone conference with D. Shafer; review documentation;
03/26/2015	8	\$270.00	0.9	924000	correspondence with clients regarding same
	_	\$250.00	1.3	\$325.00	Prepare correspondence to D. Kreifels
03/26/2015	6	\$250,00 \$250,00	0.4	\$100.00	Review email correspondence
03/26/2015	6		0.4	\$100.00	Telephone conference with D. Shafer
03/26/2015	6	\$250.00	0.3	\$75.00	Review maps
03/26/2015	8	\$250,00	0.2	\$50.00	Correspondence with clients
03/26/2015	8	\$250.00	2.1	\$525.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	16	\$250.00	0.8	\$150.00	Telephone conference with D. Shafer
03/30/2015	6	\$250.00 \$250.00	0.6	\$150.00	Study drawings
03/30/2015	8		0.4	\$100.00	Telephone conference with clients regarding same
03/30/2015	6	\$250.00	2.1	\$567.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	10	\$270.00 \$270.00	1.6	\$432.00	Telephone conference with D. Shafer regarding expert issues;
03/30/2015	6	\$270.00	1.0	9402.00	telephone conference with clients regarding same
	^	\$250,00	0.8	\$200.00	Telephone conference with D. Shafer and W. Haberman
03/31/2015	6		0.8	\$216.00	Telephone conference with D. Shafer and W. Haberman
03/31/2015	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
04/03/2015	6	\$270,00		\$108,00	Telephone conference with S. Neiman
04/06/2015	6	\$270.00	0,4	\$729.00	Analyze documentation prepared by D. Shafer;
04/06/2015	10	\$270,00	2.7	\$7.29.00	prepare outline regarding the same; telephone conference with D.
					Shafer regarding the same
	_	4440 00	0.0	\$81,00	Prepare letter to S. Neiman
04/08/2015	6	\$270.00	0,3	\$243.00	Telephone conference with D. Shafer regarding expert issues
04/10/2015	6	\$270.00	0,9	\$297.00	Begin preparation of Shafer declaration
04/14/2015	6	\$270,00	1,1		Telephone conference with D. Shafer regarding expert issues
04/15/2015	6	\$270.00	0.2	\$54,00 *135.00	Correspondence with clients
04/15/2015	6	\$250.00	0,5	\$125.00	Study summary judgment ruling
04/15/2015	6	\$250.00	1.1	\$275.00 \$50.00	Telephone conference with T. McLaughlin
04/16/2015	6	\$250.00	0.2		Correspondence with client
04/16/2015	6	\$250.00	0,3	\$75,00 *433.00	Analyze Summary Judgment decision; email difent regarding the same
04/16/2015	10	\$270.00	1.6	\$432.00	and analyze responses
			4.5	C455 00	Prepare for and attend conference call with clients
04/17/2015	10	\$270.00	1,6	\$432.00	Telephone conference with B. Kramer and others
04/17/2015	8	\$270.00	1.1	\$297.00 \$100.00	Correspondence with Fidelity
04/21/2015	6	\$250.00	0.4	\$972,00	Confer with J. Sykes regarding litigation
04/24/2015	10	\$270.00	1.6 1.3	\$351,00	Confer with R. Stacey regarding litigation
04/24/2015	6	\$270.00		\$243.00	Telephone conference with B. Haberman regarding summary judgment;
04/27/2015	10	\$270.00	0,9	\$243.00	confer with J. Sykes regarding same;
					email client; analyze client response
		2072.00	3.3	\$891.00	Confer with J. Sykes regarding issues related to litigation
05/06/2015	10	\$270.00		\$162.00	Analyza emails from client; email client
05/07/2015	10	\$270.00	0,6	\$102,00	regarding the same
				\$972.00	Research legal issues related to summary judgment
05/08/2015	10	\$270.00	3.6		
05/09/2015	10	\$270.00	0.1	\$27.00 \$1,107.00	Analyze email from client; email J. Sykes regarding same Analyze information from D. Shafer; outline Shafer declaration;
05/11/2015	10	\$270,00	4.1	\$1,107.00	analyze amail from opposing counsel
		2005.22	27	21 100 50	Travel from Boise to Sandpoint, prepare for hearing, attend hearing,
06/17/2015	15	\$225,00	5.7	\$1,282,50	telephone conference with Brian Kramer
	4.0	*070.00	0.5	2427.02	Confer with C. Nicholson regarding outcome of hearing on motion for
06/17/2015	10	\$270.00	0.6	\$162.00	final judgment
		*****	2.4	6470 60	E-mail hearing update to B. Haberman; travel Spokane to Boise
06/18/2015	15	\$225,00	2.1	\$472.50 \$548.00	Research motion to reconsider
06/22/2015	15	\$195,00	2.8	\$54 <b>6</b> .00 \$370.50	Research motion to reconsider and apposition to summary judgment
06/22/2015	15	\$195.00	1.9	\$425.00	Analyze client documents and property records
06/23/2015	6	\$250,00	1,7 <b>0,2</b>	\$50.00	Correspondence with clients
06/23/2015	6	\$250,00		\$331.50	Research regarding standard of review for 11(a)(2)(B) motion
06/23/2015	15	\$195,00	1.7	\$250.00	Analyze memorandum decision and order and confer with J. Sykes
06/23/2015	10	\$250.00	1	\$23U.UU	regarding the same
40:00:00	40	tata an	0.4	\$100_00	Email dient
06/23/2015	10	\$250.00	0.4	\$22,50	Review of Memorandum Decision and Order regarding motion for
06/23/2015	15	\$225.00	0.1	ئات,ع∠م	Entry of Final Judgment
	_	2070.00	4.0	2204.00	Review draft of final judgment; correspondence with Fidelity
06/23/2015	6	\$270.00	1.2	\$324.00	Begin drafting memoranda in opposition to JV/VP/NIR motion to
06/24/2015	15	\$195.00	0.9	\$17 <del>5</del> .50	Begin grantific trienting and an opposition to as a second money to
		****	2.0	<b>\$4.50.00</b>	
06/24/2015	15	\$195.00	0.8	\$156.00	Research LC, 55-806 Continue drafting memoranda in Opposition to JV/VP/N/R Motions to
06/24/2015	15	\$195.00	1.4	\$273,00	
		A16		407	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

06/25/2015	15	\$195,00	0.8	\$156.00	Reconsider 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	
06/26/2015	6	\$250.00	1.5	\$375.00	reconsider  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 apposition 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 10	\$270.00 \$250.00	1 2.8	\$270.00 \$700.00	Research statute of frauds  Analyza/draft/edit/finalize affidavits in support of memorandums in
07/01/2015	10	\$230.00	2.0	<b>\$7.50.00</b>	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 \$648.00	Analyze email from B, Haberman  Analyze site maps and other documents from D. Shafer; analyze
07/06/2015	10	\$270,00	2,4	\$646.00	multiple emails form 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 07/07/2015	10 10	\$250,00 \$250,00	3.1 0.3	\$775.00 \$75.00	Prepare for motion to reconsider  Telephone conference with court clerk regarding waiver of objection for
0770772033	, 0	<b>V</b> 200,00	-	•	untimely filing
07/07/2015	10	\$250,00	0.1	\$25.00	Analyze email from clerk regarding waiver of objection for unlimely filling
07/07/2015	10	\$250.00	0.3	\$75,00	Email client regarding status
07/07/2015	6 6	\$270.00 \$270.00	0.6 0.9	\$162.00 \$243.00	Confer with R. Stacey Research tax deeds; confer with R. Stacey regarding same
07/08/2015 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 small from client
07/09/2015	10	\$250.00	0,2	\$50.00	Draft/analyze response to client amail Prepare for and participate in conference call with B. Haberman and D.
07/09/2015	10	\$270,00	3,9	\$1,053.00	Shafer; arraiyze 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	<b>\$783.00</b>	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 smalls 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	8	\$270.00	11	\$297.00	Review scheduling order; attend pretrial conference
07/22/2015	15 10	\$225.00 \$270.00	1.7 3.1	\$382.50 \$1,647.00	Research regarding water rights; telephone conference regarding same; Outline changes to judgment and foreclosure decree per court's
07/22/2015					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 1	\$725.00 \$250.00	Analyze decision denying motions to reconsider  Email and telephone conferences (3) with client
07/22/2015 07/23/2015	10 10	\$250.00 \$250.00	1,6	\$400.00	Analyze/draft/edit changes to the judgment per court's memorandum decision denying motion to reconsider.
07/ <b>23/</b> 2015	10	\$270.00	3.3	\$891,00	Analyze/draft/edit changes to the decree of foreclosure per count's memorandum decision; analyze (titigation 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 10	\$225,00 \$270.00	1.4 4.1	\$315.00 \$1,107.00	Research water rights Analyze documents from B., Haberman; email D. Shafer;
07/24/2015	ij	927 U.UU	7.1	ŷ.,101.uo	analyze emails from D. Shafer regarding same; verify accuracy of plats; research legal issues
07/24/2015	8	\$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 10	\$250.00 \$270.00	0.2 1.6	\$50.00 \$432.00	Analyze emails from R. Meyers and B. Haberman Analyze email from R. Myers; analyze email from B. Haberman;
07/29/2015	10	<b>4</b> 214.00	,,9	\$402.0d	analyze small from B. Haberman to R. Myers; email B. Haberman; prepare for and telephone conference with B. Haberman email fille 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
			2.2	5040.00	preference for hearing to proceed
07/30/2015	10	\$270.00	0.9	\$216.00	Email R. Myers regarding teleconference to discuss status of case: email B, Haberman regarding the same; analyze
					email from B. Haberman; leave volcemail 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	
08/03/2015	10	\$270.00 \$270.00	1.6 11.6	\$432.00 \$3,132,00	
08/05/2015	10	\$270.00	7 + , G	\$3,132,00	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	
08/06/2015	15	\$225.00	3.1	\$697.50	
08/06/2015	10	\$250.00	0.2	\$50,00	
08/07/2015	18	\$100.00 \$270.00	5.5 8.3	\$550.00 \$2,241,00	
09/02/2015	10	\$270.00	5.5	\$2,241,00	atterfreconsider order of sale; prepare for hearing on Valiant's motion to alter or reconsider foreclosure decree and order of sale; confer with 1. Sykes regarding the same; telephone conference with clients;
09/02/2015	6	\$250.00	2.7	\$675.00	
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	5	\$250.00	1,6	\$400.00	
09/03/2015	6	\$250.00	3.2	\$800.00 \$50.00	
09/03/2015	10 10	\$250.00 \$250.00	0.2 1	\$250.00	
09/03/2015 09/03/2015	10	\$250.00	3	\$750.00	
09/03/2015	15	\$225.00	0.2	\$45,00	
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	
09/08/2015	10	\$250.00	0.5	\$125,00	
09/10/2015	10	\$250.00	5.6	\$1,650.00	
					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	
039 14920 13	,,,	4,55,55		400.700	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	
				2477.00	and objection to proposed judgment
09/14/2015	.6	\$250.00	1.9	\$475.00	
09/15/2015	15 15	\$195.00 \$195.00	0.2 9.8	\$39.00 \$156.00	Discuss research project with C. Tipton Review and analysis of MF08 All-inclusive Mortgage & Loan
09/15/2015	12	\$190.00	v.o	\$150.00	Agreement to prepare B. Ng Decl.
09/15/2015	15	\$195.00	0.8	\$156.00	
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 \$39,00	Draft Barney Ng deci. Correspondence with W. Haberman
09/17/2015 09/17/2015	15 15	\$195.00 \$195.00	0.2 0.3	\$58.50	Review and analyze: POBD mortgages with R.E. Loans, MF08 &
09/17/2015	15	\$195.00	1.3	\$253.50	Pensoo Review and analyze loan agreements between POBD and RE
09/17/2015	15	\$195.00	0.9	\$175.50	Loans/MF08 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 Research/Draft Argument regarding inconsistent Deci.
09/17/2015	18 6	\$100.00 \$270.00	4.5 1.2	\$450.00 \$324.00	Telephone conference with F. Elsaesser regarding summary judgment
09/17/2015	9	9210.00	1,2	3324.00	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 Deci.
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 \$75.00	Revise declaration of 8. Ng Telephone conference with F. Elsaesser
09/18/2015 09/19/2015	6 15	\$250,00 \$195.00	0.3 0.2	\$75.00 \$39.00	Telephone conference with Final Robnett regarding representation of POBD in conjunction with dosing 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	\$58,5	0 Review correspondence from W. Haberman
09/21/2015	15	\$195.00	1.3	\$351.0	
09/21/2015	15	\$195.00	0.2	\$39.0	
09/21/2015	15	\$195.00	2	\$390.0	
09/21/2015	6	\$250:00	1.2	\$300,0	
09/21/2015	18	\$100.00	6.2	\$620.0	
	18	\$100.00	3.2	\$320.00	
09/22/2015			0.9	\$243.00	
09/22/2015	6	\$270.00			
09/22/2015	6	\$270.00	1.1	\$297.00	
09/22/2015	15	\$195.00	0.8	\$156.00	
09/22/2015	15	\$195,00	5.1	\$994.50	
09/22/2015	6	\$250.00	0.7	\$175.00	
09/22/2015	6	\$250,00	1.4	\$350.00	
	_	****		****	and First American
09/22/2015	6	\$250.00	0.3	\$200.00	
09/22/2015	6	\$250.00	0.3	\$75.00	
09/23/2015	15	\$195.00	3.3	\$1,618.50	
09/23/2015	15	\$195,00	0.6	\$117.00	
09/23/2015	18	\$100.00	10.2	\$1,020.00	
09/24/2015	15	\$195,00	5.1	\$1,189.50	
09/24/2015	õ	\$250.00	3.9	\$975.00	7, 3
					pleadings
09/25/2015	6	\$250,00	0.2	\$50.00	
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	
09/29/2015	10	\$250.00	1.3	\$325.00	Outline deposition notices to C, Reeves 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	
10/08/2015	10	\$250.00	0.8	\$200.00	
10/08/2015	10	\$250.00	0.5	\$125,00	
10/11/2015	10	\$250.00	0.2	\$50,00	
10/12/2015	10	\$250.00	0.6	\$150,00	
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	
10/14/2015	15	\$195,00	0.7	\$136.50	
10/14/2015	5	\$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	\$250.00	0.4	\$100.00	
10/14/2015					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 amails from 3. Haberman and 3. 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	5	\$270.00	1.9	\$513.00	Study FACTO little 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 Dadi, 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 cilent responses
10/20/2015	10	\$250.00	0.7		Draft/analyze/edit changes to 8. Ng. Dect.
10/20/2015	10	\$250.00	0.2		Email B. Ng
10/20/2015	10	\$250.00	0.2		Telephone conference with B. Ng
10/20/2015	10	\$250.00	0.2		Draft/analyze changes
	10		0.1		Email the modified agreement to B. Ng
10/20/2015		\$250,00			
10/21/2015	15 1 <b>=</b>	\$195.00 \$195.00	0.7		Research regarding residual exception to hearsay rule
10/21/2015	15	\$195.00	0.9		Research regarding admissibility and use of impeachment evidence
10/21/2015	15	\$195,00	9.5		Research regarding business record exception to hearsay rule
10/22/2015	8	\$250.00	2.2		Continue preparation for hearings on motions for reconsideration and
10/00/00 - =		<b>3050.00</b>			second summary judgment motion
10/22/2015	6	\$250.00	3		Travel to Sandpoint, Idaho
10/22/2015	10	\$250.90	5.1	\$1,275,00	Analtye briefing and prepare for hearing on motion for summary

					iuriamant
	40	### OF OF	2.9	\$725.00	judgment Travel to Spokane, Washington
10/22/2015	10 6	\$250,00 \$250,00	5 5	\$1,250.00	Appear for/attend hearings on motions for reconsideration and second
10/23/2015	0	<b>9200.00</b>	•	*	summary ludoment 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
			3	\$750.00	summary judgment Travel to and from Spokane, WA to Sandpoint, ID
10/23/2015	10	\$250.00 \$250.00	3.8	<b>3</b> 950.00	Travel from Spokane, WA to Boise, ID
10/24/2015	10 15	\$195.00	0.9	\$175.50	
10/26/2015 10/26/2015	6	\$250.00	2.9	\$725.00	Correspondence with D. Kreifels
10/26/2015	é	\$250.00	0.4	\$100,00	
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 rfps Draft/analyze/edit rfps and rogs to defendants VP, NIR and JV
10/26/2015	10	\$250.00	3.1 0.8	\$775,00 \$200,00	
10/26/2015	10	\$250,00 \$250.00	0.4	\$100.00	
10/26/2015	10	\$250.00	4.4	*	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. Halhaway; telephone conference with M.
(6)-61					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
		****	4.4	\$297,00	Analyze email from counsel for First American; draft/analyze/edit
10/27/2015	10	\$270.00	1.1	\$287,00	response to the same
40/07/05/5	15	\$195.00	4.4	\$858.00	Analysis of documents produced by First American Title Co.
10/27/2015 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 ret deposition dates
10/27/2015	10	\$250.00	2.7	\$675.00	
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 Analyze responses to the same
10/28/2015	10	\$250.00	0.3	\$75.00 \$350.00	Compile documentation requested by First
10/28/2015	10	\$250,00	1.4	\$350.00	American and amail the same to counsel for the same
40/08/D04F	10	\$250.00	0.6	\$150.00	Compile documentation for D. Shafer
10/28/2015 10/28/2015	10	\$250.00	0.3	\$75.00	Analyze email from court clerk
10/29/2015	10	\$250.00	1,8	\$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	\$75.0 <b>0</b>	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 Review of Disclosure Statement for Joint Chapter 11 Plan of
10/30/2015	15	\$195,00	0,5	\$97.50	Recognition filed in R.E. Loans Texas benkruptcy
		then an	0.8	\$200,00	Review and respond to correspondence from D. Kreifels
10/30/2015	5 10	\$250,00 \$250,00	0.8	\$200.00	Analyze emails and volcemali from G, Edson and leave voicemail in
10/30/2015	: u	\$2.5 <b>0</b> ; <b>0</b> 0	0.0	<b>V</b>	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. Kraifels
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	Continua Review of RE Loans bankruptcy Analyze letter from G. Edson
11/03/2015	10	\$250.00	0.6	\$150.00 \$75.00	Telephone conference and email with client
11/03/2015	10	\$250.00	0,3 1,2	\$324.00	Analyze emails from M. Hathaway; respond to same
11/03/2015	10	\$270.00	1.2	\$024.50	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;
11/04/2010	10	412. 0.00			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
			A -	8405.85	voicemail for D. Marfice regarding deposition dates telephone conference with paralegal for Susan Weeks and G. Finney
11/05/2015	10	\$250,00	0.5	\$125.00	telephone conference with paralogal for Susair Weeks and Stylinkoy
		*050.00	0.4	\$100.00	regarding deposition telephone conference with P. DeAngeli regarding scope of Lynskey
11/05/2015	10	\$250.00	0.4	\$100,80	lestimony
44/05/0045	10	\$250.00	0.3	\$75.00	Telephone conference with P. DeAngeii
11/05/2015 11/05/2015	10	\$250.00	1.2	\$300.00	Analyze Sandpoint Title documents and email from M. Hathaway
11/00/2013		***************************************			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
				gana an	heard on October 23, 2015 Study memorandum decision and order on summary judgment motion
11/11/2015	6	\$250.00	1.2	\$300,00 \$225.00	Review/analyze order on summary judgment motion
12/02/2015	6	\$250.00 \$250.00	0.9 5.6	\$1,400.00	Research fees/costs
6/23/2016	10 10	\$250.00	6.1	\$1,525.00	Continue researching fees/costs; outline motion for fees and costs;
6/24/2016	, U	WEST, CO			analyze fee/cost invoices; telephone conference with B. Haberman;
					confer with J. Sykes; compile invoices
8/27/2016	10	\$250.00	6.3	\$1,575.00	Analyze/draft/edit motion for fees/costs
6/28/2016	10	\$250.00	6.7	\$1,875.00	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 Continue to analyze/draft/edit motion for fees/costs
					Continue to analyze/frat/edit mouth for tees/costs
6/30/2016	10	\$250.00	7.8	\$1,950.00	CONTROL TO ST. MILITARY ST. T. T

inare	33,375	240.33	\$50,222.00	•
JV's Pro Rata Share		33.3% 249.93	\$56,222.00	\$56,222.00
s		749.80	\$168,666.00	
17	\$90.00	8	\$720.00	Finalize work in connection with exhibits to to memorandum of costs
10	\$250.00	7.1	\$1,775.00	Analyze/draft/finalize motion for fees/costs
17	\$90.00	11.75	\$90.00	Finalize spreadsheets and identification of invoices in support of memorandum of costs and fees
17	\$90.00	8.75	\$90.00	Segregate spreadsheets and organize invoices in support of memorandum of costs and fees; incorporate data within memorandum
17	\$90.00	11	\$90.00	Segregate spreadsheets and organize invoices in support of memorandum of costs and fees
17	\$90.00	5.5	\$90,00	Compile spreadsheets and organize invoices in support of memorandum of costs and fees
10	\$250.00	0.5	\$125.00	Analyze email from client; draft changes to proposal; emails and telephone conference with client
	17 17 17 17 10 17	17 \$90.00 17 \$90.00 17 \$90.00 17 \$90.00 10 \$250.00 17 \$90.00	17 \$90.00 5.5 17 \$90.00 11 17 \$90.00 8.75 17 \$90.00 11.75 10 \$250.00 7.1 17 \$90.00 8	17 \$90.00 5.5 \$90.00 17 \$90.00 11 \$90.00 17 \$90.00 8.75 \$90.00 17 \$90.00 11.75 \$90.00 10 \$250.00 7.1 \$1,775.00 17 \$90.00 8 \$720.00 18 <b>749.80</b> \$168,666.00

#### EXHIBIT C

# Subsection C-1 GENESIS V. POBD and VALIANT FORECLOSURE Fees Attibuted to NIR

Trans Date	Atty	Rate	Hours to SIII	Amount	
10/26/2012	15	\$190.00	1.5	\$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
		2400.00		\$0.00	No charge: Review of file regarding NIR claim
11/19/2012	15	\$190.00	1	\$250.00	Analyze North Idaho Resorts cross-claim and property records
03/20/2013	10	\$250.00	0.9	<b>\$2</b> 25.00	Analyze properties subject to cross-claim
03/20/2013	10	\$250.00	1.3	\$325.00	Analyze email and attachment from J. Krause; reply to same; finalize
03/21/2013	10	\$250.00	:,3	\$323.VS	isition to S. Weeks regarding NIR claims; analyze NIR complaint and email J. Holley regarding title policy
04/15/2013	10	<b>\$</b> 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
0.10510040	10	\$170.00	2.8	\$475.00	Analyze/draft/edit Answer and Cross Claim to NIR
04/25/2013	10	\$170.00	0.6	\$102.00	Finalize cross-claims against NfR
04/26/2013	15	\$190.00	0.1	\$19,00	E-mail to S. Weeks
08/16/2013	15	\$190.00 \$190.00	0.1	\$19.00	Telephone call to S. Weeks
08/19/2013	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		\$270.00	0.8	\$216.00	Arrefore disordings filed by North Idaho Resorts; analyze
08/07/2014	10	\$210,00		,	email from Wells Fargo and reply to same; analyze email from W. Haberman; email counsel for Wells Fargo Analyze decision granting motion to substitute Valiant as the real party
09/11/2014	10	\$279.00	1.7	\$459.00	in interest; analyze amaif from W. Haberman; telephone conferences (2) with 5, Weeks regarding acceptance of service; thatfeuit 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.
10104/5045	10	\$250.00	2.8	\$700.00	Draft/revise requests for admission and interrogatories to NIR
10/01/2015	10	\$250.00	3.1	\$775.00	Analyve/draft/edit requests for admission and interrogatories to NIR
10/05/2015	10 10	\$250.00 \$250.00	1.1	\$275.00	Review/analyze project documents and pleadings for discovery issues
10/05/2015		,		\$175.00	related to the same Finalize interrogatories to NIR
10/06/2015	10	\$250.00	0.7	********	CRIBING INTERFORMED TO THE C
Subtotal of Fe	es		28.90	\$6,081.00	

### Subsection C-2 VALIANT FORECLOSURE Fees Attibuted 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
20(44)0045	•	\$250.00	0.2	\$50,00	Telephone conference with S. Weaks.
02/11/2015	8	\$250.00	4	\$1,000.00	Prepare reply memorandum to NIRIVP summary judgment opposition
02/23/2015	5	\$250.00	6.2	\$1,550.00	Continue preparation of reply memorandum to North Idaho Resorts
03/05/2015	731	\$250.00	V.4	* .,	and VP's opposition
		\$250.00	6.8	\$1,700.00	Continue preparation of summary judgment reply memoranda
03/06/2015	6	\$100.00	1.5	\$150,00	Research Equitable Servitude Requirements and Inquiry Notice
03/06/2015	18		2.2	\$220.00	Research Equitable Servitude Requirements and Inquiry Notice
03/07/2015	18	\$100.00	3.2	\$800.00	Revise summary judgment reply memoranda
03/09/2015	6	\$250.00	9.3	\$75.00	Correspondence with D. Shafer regarding legal description
03/09/2015	6	\$250.00	9.3 9.3	\$81.00	Correspondence with O. Shafer regarding expert issues
03/09/2015	6	\$270.00	5.7	\$1,425,00	Revisions to summary judgment reply memoranda
03/10/2015	6	\$250,00		\$610.00	Draft/Revise/Send Memo on Equitable Servitudes
03/10/2015	18	\$100.00	6_1	\$999.00	Analyze defendants VP's and NIR's second molion for enlargement of
05/27/2015	10	\$270,00	3.7	<b>\$</b> \$\$4.00	Itime 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
				\$324.00	Telephonic meeting with clients; correspondence with Fidelity
05/27/2015	8	\$270,00	1.2	\$324.00 \$273.00	
06/16/2015	15	\$195.00	1,4	\$273.00	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
	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
07/06/2015	10	\$250.00	1.8	\$450.00	Analyze NIR objection
07/07/2015	10	- <b>3</b> 230.00	7,4	• /	

07/07/2015	15	\$225.00	0.6	\$135.00	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 olient re: the same; email D. Shafer and B. Haberman regarding conference call;
					email R. Lynksey; analyze response;
09/04/2015	10	\$270.00	3.4	\$918,00	email D. Stapels  Analyze motion for proposed order of sale; analyze Valiant
08/04/2015	10	<b>32</b> 50,00	<b>0,</b>	40.000	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 8. 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 18	\$225.00 \$100.00	5.4 2.9	\$1,440,00 \$290,00	Research regarding subrogation and redemption Review redemption research; confer with J. Sykes;
08/11/2015	10	g : 00,00	4,40	4250,00	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, marshailing, and inverse alienation
08/12/2015	15	\$225,00	2.9	\$652.50 \$620.00	Continued research regarding marshalling of assets Research waiver and inverse alienation
08/13/2015	18 10	\$100,00 \$270,00	5.2 6.2	\$1,674,00	Analyze litigation guarantee and mortgages;
08/13/2015	, 0	Ψ210,5 <b>c</b>		*****	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 small to
					same regarding documentation; analyze email from D. Shafer; telephone conference with D. Shafer
98/13/2015	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
		****	40.0	\$2,787.50	Shafer regarding properties     Additional research & draft memo support motion reconsider order of
08/16/2015	15	\$225.00	12.3	\$2,757.00	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
		*****	4.2	<b>\$96</b> 7.50	support of motion to reconsider order of sale and decree of foreclosure Revise memo supp reconsider order of sale; additional research
08/17/2015	15	\$225,00	4,3	<b>4</b> 901.30	regarding marshalling of assets
08/17/2015	6	\$270.00	1.1	\$297.00	Confer with R. Stacey regarding foreclosure procedure; study
				#arn 04	correspondence from D. Shafer
08/18/2015	18 10	\$100.00 \$270.00	2.5 8.1	\$250.00 \$2,187.00	Research marshalling of assets  Analyze/edit draft memorandum in support of proposed order of sale;
08/18/2015	ŧŪ	\$270,00	0.1	42, 101,00	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; small 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 \$2,322.00	Continue draft Memo, Supp Motion Alter, Amend, Reconsider Analyze/draft/edit motion for proposed order for sale and to alter
08/19/2015	10	\$270.00	8,6	\$2,322.00	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
					analyza legals discussed by D. Shater; analyze D. Shater 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	4,3	\$1,296.00	Analyze Valkant'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
	~	torn 20	0.4	\$100.00	alter order of sale; confer with J. Sykes Prepare meet and confer correspondence to S. Weeks
09/14/2015 09/30/2015	6 10	\$250.00 \$250.00	0.4 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
10/17/2015	10	\$250,00	1.1	\$275,00	the motions to reconsider  Analyze NIR and VP motion for additional time
10/13/2015 10/13/2015	10	\$250.00	1,3	\$325.00	Outline objections to the same
10/13/2015	10	\$250.00	0.2		Email the same to client
10/13/2015	10	\$250.00	9.4 1.5	\$100.00 \$375.00	Telephone conference with elient regarding the same Analyze VP and NIR's opposition to motion for summary judgment and
10/14/2015	10	\$250.00	1,5	4010.00	supporting affidavils
					• · · · · · · · · · · · · · · · · · · ·

NIR's Pro Rata	Share	50.0%	103.35	\$22,466.00	
Subtotal of Fee:	5		206.70	\$44,932.00	
11/05/2015	10	\$200.00	0,0	y,2074	and analyze email from S. Weekas regarding the same
11/05/2015	10	\$250,00	0.5	<b>\$125.00</b>	deposition dates and analyze/draft response to the same telephone conference with S, weeks regarding deposition availability
11/02/2015	10	\$250,00	0.5	\$125,00	Analyze small from S. Weeks and voicemail from the same regarding
10/28/2015	16	\$250.00	0.2	\$50.00	Email the same to client
10/29/2015	10	\$250.00	1.1	\$275.00	Analyze discovery requests from NIR and VP
10/27/2015	10	\$250.00	0.2	\$50.00	Analyze email from S. Weeks regarding deposition dates for NIR and VP
10/21/2015	10	\$250.00	0.5	\$125.00	Draft/analyze/finalize motions to strike and memoranda affidavite in support of the same
10/21/2015	10	\$250.00	3.3	\$825.00	same
10/21/2015	15	\$195.00	1.9	\$370.50	Reply to NIR-VP's Opp to Valiant's First Motion to Strike Analyze/draft/edit motions to strike and memoranda in support of the
10/20/2015	15	\$195.00	0.4	\$78.00	Research Re: 56(f) standards
10/19/2015	10	\$250.00	0.2	\$50,00	
10/19/2015	15	\$195.00	5.6	\$1,092.00	Email S, Weeks regarding deposition of NIR and VP
10/18/2015	15	\$195,00	2.6	\$507.00	Begin drafting Reply in Respond to NIR/VP's Opp to Third SJ Motion
10/18/2015	15	\$195.00	0,5	\$97.50	Begin draft Reply to NIR/JV Opp to 3rd SJ Motion
10/16/2015	15	\$195.00	0.2		Analysis of NIR/VP opp to Valiant's 3rd Su
10/15/2015	15	\$195.00	2.9	\$565.50 \$39.00	Analysis of NIRVYP opp 3rd SJ Motion
10/15/2015	15	\$195.00			Research regarding 56(f) requirements
		****	2.1	\$409.50	Opp to NIR/VP's Rule 56(f) & Motion Extend Time under Rule 6(e)(1)

# Subsection C3 GENESIS v. POBD Case No. CV 09-1810 Fees Attibuted Jointly to NIR and JV

Trans Date	Atty	Rate	Hours to Sill	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 <sub>s</sub> Stacey regarding property involved in various suits; conference with R. Stacey
03/20/2013	10	\$250,60	2.9	\$725,00	Analyze email from client and respond to same; analyze motion to lift MF08 bankruplcy 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	Analyza 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 amail 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
Subtotal of Fe	:es		15.70	\$3,297.00	
NIR's Pro Rata	Share	50.0%	7.85	\$1,648.50	

## Subsection C-1 VALIANT FORECLOSURE Fees Attibuted 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	8,0	\$216,00	Telephone conference with G. Finney regarding 7 day extension to answer completint, 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	16	<b>\$</b> 279.00	2.1	\$567.00	Analyze email from C. Dodson; draft/edit acceptance of service; analyze email from T. McLaughilin 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; smail 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

					enswer to JV, LLC daims; analyze motion filed by VP, LLC; t/c J. Breaux re: golf course; t/c and emails with client; confer w/ J. Sykes
10/08/2014 11/20/2014	6 10	\$160.00 \$270,00	0.6 2.3	\$96.00 \$621.00	Strategy conference with R. Stacey
11/26/2014	5	\$270.00	0.4	\$108.00	
12/03/2014	5	\$270.00	4.2	\$1,134.00	
12/04/2014	8	\$270.00	3,2	\$864.00	
12/08/2014	8	\$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	
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	
12/11/2014	6	\$270.00	3.1	\$837.00	
12/12/2014	6	\$270.00	2.2	\$594,00	
12/15/2014	6	\$270,00	7,4	\$1,998.00	Continue preparation of summary judgment; ravise 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
100000044	6	\$270,00	2.1	\$567,00	Research issues related to summary judgment motion
12/16/2014 12/16/2014	3	\$270.00	4.2	\$1,134.00	Study research memorandum and related regulations
12/17/2014	5	\$270.00	6	\$1,620,00	Continue preparation of summary judgment motion and supporting
1211112014	•	92, 0.00	•	* ,,-=-,	pleadings; telephone conference with J. Hamilton; study real property records
12/22/2014	10	\$270.00	0.8	\$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 Confer with J. Sykes regardoing summary judgment issues
01/09/2015	10	\$270.00	0.4	\$106.00 \$1,053.00	Review and revise memorandum in support of motion for summary
01/09/2015	6	\$270.00	3.9		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 \$891,00	Telephone conference with D. Shafer Continue drafting summary judgment memorandum and supporting
01/13/2015	6	\$270.00	3_3	<b>309</b> 1,00	pleadings
01/14/2016	6	\$270.00	5	\$1,350,00	Prepare summary judgment supporting declaration of counsel; revise summary judgment memorandum
01/15/2015	â	\$270,00	4,8	\$1,296.00	Revise summary judgment legal arguments; final declaration of courses
04 (4 0/004 6	6	\$270.00	3,5	\$945,00	Telephone conference with client; final summary judgment pleadings
01/16/2015 01/16/2015	6	\$250.00	2.9	\$725.00	Prepare documents requested by client
01/20/2015	8	\$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	5	\$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	3.8	\$380,00	Research requirements related to clubhouse
02/03/2015	10	\$270.00	0.4	\$108.00	Confer with J. Sykes regarding illigation
02/04/2015	18	\$100,00	4.1	\$410.00	Review case law; outline argument
02/06/2015	10	\$250.00	2.1	\$525.00	Review/analyze Summary Judgment responses
02/05/2015	10	\$250.00	0.3	<b>\$75.00</b>	
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 02/12/2015	6 5	\$250.00 \$250.00	0,9 0,2	\$225.00 \$50.00	Prepare stipulation to reschedule summary judgment hearing Correspondence with S. Weeks and G. Finney regarding possible
02/13/2015	6	\$250.00	0.9	\$225.00	settlement conference Correspondence with clients
02/18/2015	6	\$270.00	2,\$	\$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 amails from client and analyze/draft responses to the
02/23/2015	10	\$250,00	2.1	\$525.00	same Review/analyze memorandums filed in opposition to client's motions
02/24/2015	5	\$250,00	4.2	\$1,050,00	for summary judgment Continue preparation of reply memoranda to summary judgment
	~	2070.00	20	\$594.00	oppositions by JV, NIR and VP Prepare letter to Fidelity
02/24/2015	3	\$270.00	2,2	\$700.00	Prepare tener to Fidelity
03/03/2015	6	\$250,00 \$250,00	2,8 2.2	\$550.00	Begin preparation for hearing on summary judgment motions
03/11/2015	6	\$250.00 \$250.00	0.3	\$75.00	Correspondence with D. Shafer
03/12/2015	6	\$250.00 \$270.00	0.3	\$81.00	Correspondence with D. Shafer regarding expert issues
03/12/2015	6 6	\$270.00 \$250.00	1.2	\$300,00	Telephone conference with 5. Kramer and W. Haberman
03/13/2015 03/16/2015	6	\$250.00 \$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	
03/16/2015	6	\$250.00	0,2	\$50.00	
	6	\$250.00	0,5	\$125.00	
03/16/2015	10	\$270.00	0.6	\$162.00	
03/16/2015	10	\$270,00	1.7	\$459.00	
03/16/2015	10	\$270.00	0,6	\$162.00	
03/16/2015			0.2	\$54.00	
03/16/2015	6	\$270.00	0.5	\$135.00	
03/16/2015	8	\$270.00	0.2	\$50.00	
03/17/2015	10	\$250,00		\$875.00	
03/17/2015	8	\$250,00	3,5		
03/18/2015	8	\$250,00	6.5	\$1,625.00	
				*400.00	to Spokana, Washington
03/18/2015	6	\$250.00	3,2	\$800.00	
03/18/2015	8	\$250.00	0,7	\$175.00	
				#07F 00	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	
03/23/2015	<b>\$</b>	\$250.00	2.1	\$525.00	
03/23/2015	5	\$270,00	2.1	\$567.00	
03/24/2015	6	\$270.00	1.1	\$297,00	Correspondence with B. Kramer;
					telephone conference with S. Nieman
03/24/2015	6	\$279.00	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	
	6	\$250.00	0.2	\$50,00	Telephone conference with D. Shafer
03/25/2015				\$189.00	Correspondence with B. Kramer; telephone conference with J. Miller;
03/25/2015	8	\$270.00	0.7	\$ (35.00	telephone conference with S. Nieman
				254.00	
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	5	\$250,00	0.4	\$100,00	Review amail 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
	10	\$250,00	2.1	\$525.00	Prepare for and attend teleconference call with clients and J. Sykes
03/30/2015	6		0.8	\$150.00	Telephone conference with D. Shafer
03/30/2015		\$250.00 \$250.00		\$150.00	Study drawings
03/30/2015	6	,	0.6	\$100.00	Telephone conference with clients regarding same
03/30/2015	6	\$250,00	0,4		Prepare for and attend teleconference call with ofients and J. Sykes
03/30/2015	10	\$270.00	2.1	\$567.00	
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;
04/00/20 (3		\$£10.00	<b>14</b> 0.7	*	prepare outline regarding the same; telephone conference with O.
					Shafer regarding the same
		#070.00	0.3	\$81.00	Prepare letter to S. Neiman
04/08/2015	6	\$270.00			Telephone conference with D. Shafer regarding expert issues
04/10/2015	6	\$270.00	0.9	\$243.00	
04/14/2015	5	\$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	5	\$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
	10	\$270,00	1,6	\$972.00	Confer with J. Sykes regarding litigation
04/24/2015		\$270,00	1.3	\$351,00	Confer with R. Stacey regarding litigation
04/24/2015	6			\$243.00	Telephone conference with B. Haberman regarding summary judgment:
04/27/2015	10	\$270.00	0.9	\$243.00	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 illigation
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,
5011112010		4220.00		. ,	telephone conference with Brian Kramer
00/47/2045	10	\$270.00	0.6	\$162,00	Confer with C. Nicholson regarding outcome of hearing on motion for
06/17/2015	10	\$270.00	U,U	₩10£.0U	final judgment
		tone on	2.4	\$470 CO	E-mail hearing update to B. Haberman; travel Spokane to Boise
06/18/2015	15	\$225.00	2.1	\$472.50	
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	•	\$250.00	regarding the same
06/23/2015 06/23/2015	10 15	\$250.00 \$225.00	0.4 0.1	\$100.00 \$22.50	Review of Memorandum Decision and Order regarding motion for
					Entry of Final Judgment
06/23/2015 06/24/2015	<b>6</b> 15	\$270,00 \$195.00	1.2 0.9	\$324.00 \$175.50	Begin drafting memoranda in opposition to JV/VP/NIR motion to
00/04/0045	15	\$195.00	8.0	\$156,00	reconsider Research I.C. 55-806
06/24/2015 06/24/2015	15 15	\$195.00	1.4	\$273.00	
	45	2400.00	0.5	\$97.50	
06/24/2015	15 15	\$195.00 \$195.00	1.3	\$253.50	
06/24/2015 06/25/2015	15	\$195.00	3.2	\$624.00	
06/25/2015	15	\$195.00	0.8	\$156.00	
08/25/2015	15	\$195.00	1.2	\$234.00	
06/26/2015	15	\$195.00	7.2	\$1,404.00	reconsider
06/26/2015	6	\$250.00	1.5	\$375,00	
06/26/2015	10	\$250.00	0.5	\$125.00	
06/29/2015	15	\$195.00	1.6	\$312,00	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	
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 amails form D. Shafer, draft responses to same; (3) talephone conference with D. Shafer; amail 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	\$250.0G	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 smail from clerk regarding waiver of objection for untimely filing
571071004E	10	\$250.00	0,3	\$75,00	Email client regarding status
07/07/2015 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. Shaples: telephone conference with W. Haberman re same;
27/00/004 F	40	\$250.00	9.7	\$2,425.00	analyze emails from W. Haberman Travel to and from Sandpoint, Idaho
07/08/2015 07/08/2015	10 10	\$250.00	3.4	\$850.00	Prepare for and argue in opposition to NIR, VP and JV's motions to
Ol MONED 10		<b>4</b> 250,00	•		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	†O	\$250.00	0.2	\$50.00	Oraft/analyze response to client amail
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 amails 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. Habermen and D. Shafer
07/13/2015	10	\$270.00	4,3	\$1,161.00	Research permits and platting requirements;
0):13420:0	, 0	<b>92</b> 7 3.30	.,0	7.1	analyze emails to and from B. Haberman and D. Shafer;
					analyze exhibits emailed from B. Haberman; draft/analyze email to him
				7007 20	regarding the same
07/22/2015	6	\$270.00	1,1 1,7	\$297.00 \$382.50	Review scheduling order; attend pretrial conference Research regarding water rights; telephone conference regarding same;
07/22/2015 07/22/2015	15 10	\$225.00 \$270.00	6.1	\$1,647.00	Outline changes to judgment and foreclosure decree per court's
0112212013	10	\$2.70.00	<b>.</b>	• (10)	memorandum decision; analyze emails from C. Reeves and client; confer with C. Nicholson and J. Sykes regarding the same: draft/analyze multiple arrails to difent regarding same; confer with local counsel regarding the same; analyze amails from client and C. Reeves; perform legal research in 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	1.5	\$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 littigation guarantee;
07/00/00/0	e	g970 00	0.6	\$162.00	request copies of recorded instruments from First American Review/analyza judgment and order of sale
07/23/2015 07/24/2015	8 15	\$270.00 \$225.00	1.4	\$315.00	Research water rights
31.2.3.2010	, -		**	_	-

07/24/2015	10	\$270.00	4.1	\$1,107.00	
9772472013	,0	<b>42.0.00</b>			analyze emails from D. Shafer regarding same; verify
					accuracy of plats; research legal issues
07/24/2015	5	\$270.00	0.4	\$108.00	Review/analyze decrea of foreclosure
07/27/2015	10	\$270.00	0.4	\$108.00	Analyze emails from B. Haberman and respond to the same; analyze
				acos 00	amail from R. Myers and respond to the same Prepare correspondence regarding decisions issued by court on
07/28/2015	6	\$250.00	2.1	\$525.00	motions for reconsideration
		****	2.2	\$50.00	Analyze emails from R. Meyers and B. Haberman
07/28/2015	10	\$250,00	0.2 1.6	\$432.00	Analyze small from R. Myers; analyze small from B. Haberman;
07/29/2015	10	\$270.00	1.0	3432.00	analyze emails from 8. Haberman to R. Myers; email 8. 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 3. Haberman; leave voicemail for court clerk ret order
					vacating hearing on proposed order of sale; telephone conference with
				****	court clark regarding the same
07/31/2015	10	\$250.00	2.4	\$600.00	Analyze documents from Bonner County Assessor Analyze utility easement documents
08/03/2015	10	\$270.00	1,6	\$432,00	Prepare for hearing; travel to Sandpoint, ID and back to Boise, ID;
08/05/2015	10	\$270.00	11.6	\$3,132.00	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 8. Kramer regarding
					outcome of hearing; B. Haberman regarding outcome of hearing
	40	\$100.00	8.1	\$610.00	Research foreclosure sales
08/06/2015	18		3.1	\$697.50	Research regarding foreclosure sales
08/06/2015	15	\$225.00 \$250.00	0.2	\$50.00	Analyze amail from Fidelity
08/06/2015	10	\$100.00	5.5	\$550,00	Research credit bidding
08/07/2015 09/02/2015	18 10	\$270,00	9.3	\$2,241.00	Travel from Boise, ID to Sandpoint, Idaho for the motion to
09/02/2015	,0	\$210,00	5.0	<b>V</b> 2(12.1,700	alter/reconsider order of sale; prepare for hearing on Vallant'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	3800.00	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 amails 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 8, 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
				2054.00	with C. Nicholson regarding the same Begin drafting Memo Supp. Motion to Reconsider the Court's 9-4-15
09/14/2015	15	\$195.00	1.8	\$351.00	decision; confer with J. Sykes and R. Slacey
				daen an	Outline arguments for motion to reconsider
09/14/2015	10	\$250.00	1.4	\$350.00 \$600.00	Outline arguments for motion for summary judgment
09/14/2015	10	\$250.00	2.4		Meet to discuss motion to reconsider, summary judgment
09/14/2015	10	\$250.00	1.5	\$375.00	and objection to proposed judgment
001/1/0045	-	#250.00	1,9	\$475,00	Outline issues for third summary judgment motion
09/14/2015	5	\$250.00	0.2	\$39.00	Discuss research project with C. Tipton
09/15/2015	15 15	\$195.00 \$195.00	0.8	\$156,00	Review and analysis of MF08 All-Inclusive Mortgage & Loan
09/15/2015	15	\$195.00	0.0	4,00,00	Agreement to prepare B. Ng Deci.
B014E1204E	15	\$195.00	0.8	\$156.00	Begin oreparing Ng Deci.
09/15/2015 09/15/2015	18	\$100,00	2.3	\$230.00	Discussion with C. Nichelson; Research regarding inconsistent
USI : 3/20 10	10	\$ 100100			declarations
09/16/2015	18	\$100.00	3.8	\$380,00	Discussion with C. Nicholson; Research regarding inconsistent
USI TURBUTU	,~				declarations
09/16/2015	15	\$195,00	3.5	\$682.50	Draft Barney Ng daci.
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 &
Jul	-				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 Pensoc 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,
					stc.)
09/17/2015	6	\$250.00	0.3	\$75,00	Review scheduling order regarding expert disclosures Study second summary judgment motion and supporting pleadings
09/17/2015	6	\$250.00	3.2	\$800,00	Telephone conference with F, Elsaesser
09/17/2015	6	\$250.00	0.9	\$225,00	Telephone conference with W. Haberman
09/17/2015	6	\$250.00	0.3	\$75.00 \$450.00	Research/Draft Argument regarding inconsistent Decl.
09/17/2015	18	\$100.00	4.5	\$450.00 \$324.00	Telephone conference with F. Elsaesser regarding summary judgment
09/17/2015	6	\$270,00	1.2	\$024.UU	motion; telephone conference with W. Haberman
		#49E 99	0.4	\$19.50	Review Notice regarding proposed Judgment between VP, NIR & JV,
09/18/2015	15	\$195,00	0.1	313.50	Contract control and monthly brokenson and district a property of the contract

					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	
09/18/2015	15	\$195.00	0.8	\$156.00	
09/18/2015	15	\$195.00	2.4	\$468.00	· · · · · · · · · · · · · · · · · · ·
09/18/2015	6	\$250.00	1,4	\$350.00	Revise declaration of B. Ng
09/18/2015	đ	\$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 9.Ng
09/21/2015	15	\$195.00	0.3	\$58.50	
09/21/2015	15	\$195.00	1_8	\$351.00	Revise Ng Decl.
09/21/2015	15	\$195.00	0.2	\$39.00	
09/21/2015	15	\$195,00	2	\$390,00	
09/21/2015	6	\$250.00	12	\$300.00	Telephone conference with B. Ng
09/21/2015	18	\$100.00	6.2	\$620.00	
09/22/2015	18	\$100.00	3.2	\$320.00	
09/22/2015	5	\$270,00	0.9	\$243,00 \$297.00	
09/22/2015	5	\$270,00 \$195.00	1.1 0.8	\$156.00	Finish revisions to second draft of Ng Declaration
09/22/2015	15 15	\$195.00	5.1	\$994,50	Continue draft Memo Supp 3rd MSJ
09/22/2015 09/22/2015	3	\$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
	_		2.3	2000 00	and First American Correspondence with W. Haberman
09/22/2015	6	\$250.00	0.3 0.3	\$200.00 \$75.00	
09/22/2015	6	\$250,00	9.3	\$1,618.50	Continue draft Summary Judgment
09/23/2015	15 15	\$195.00 \$195.00	0.6	\$117.00	Strategy discussion with J. Sykes and C. Tipton
09/23/2015 09/23/2015	18	\$100.00	10.2	\$1,020.00	Draft Memo/Argument regarding Shafer Deci.
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
00/05/0045	~	rose no	0.2	\$50.00	Correspondence wit S. Rasor
09/25/2015	6 10	\$250.00 \$250.00	2.7	\$675.00	Oulline discovery to NIR and JV, LLC
09/29/2015 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. Villelli
09/29/2015	6	\$250.00	1.2	\$300,00	Outline issues regarding depositions, discovery and summary
united to	_				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	Reviewlanalyze 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 Telephone conference with D. Shafer
10/08/2015	10	\$250.00	0.5	\$125.00 \$50.00	Review/analyze email from client
10/11/2015	10	\$250,00 \$250,00	0.2 0.6	\$150.00	Email clients
10/12/2015	10 10	\$250.00 \$250.00	0.3	\$75.00	Analyze emails from client regarding the same
10/12/2015 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 deci.
10/14/2015	ē	\$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  Draft notice for client to attend nearing telephonically
10/14/2015	10	\$250.00	9.3	\$75.00 \$475.00	Review/analyze correspondence from clients
10/15/2015	6	\$250.00	1.9	\$175.00	Telephone conference with B. Haberman and B. Kramer
10/15/2015	10 10	\$250.00 \$250.00	0.7 1.8	\$450.00	Outline response
10/15/2015 10/15/2015	10	\$250.00	0.6	\$150.00	Analyze emails from B. Haberman and B. Kramer
10/15/2015	10	\$250.00	0.5	\$150,00	Analyza/edit additional points
10/15/2015	10	\$250.00	0.2	\$50.00	Talaphone 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 amail the same to M. Hathaway
10/16/2015	15	\$195,00	1.3	\$312.00	Draft/revise Dect/Aff Opp Third SJ Motion or alternative Request for Extension of Time to reply and revise supporting Nicholson dect
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	0.8	\$150,00	Telephone conference with 9. Haberman and 8. Kramer
10/16/2015	5	\$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	1,3	\$351.00	Research breach of note/loan agreement  Draft/analyze/edit affidavit of 3. Ng
10/19/2015	10	\$250.00	1.7	\$425.00 \$275.00	Analyze documents related the foregoing reply pleadings
10/19/2015 10/20/2015	10 15	\$250,00 \$195.00	1,1 1,1	\$275.00 \$214.50	Analysis of exhibits submitted by JV and NIR/VP in opp to 3rd SJ
	_	****	2.5	ann on	Motion Perif Nicholson Dagi. Bated 19/20/15
10/20/2015	15	\$195.00	0.2	\$39.00 \$75.00	Draft Nicholson Decl. Dated 19/20/15 Review/analyze second Ng declaration
10/20/2015	6	\$250.00	0.3	\$75.00 \$200.00	Prepare status update
10/20/2015	5	\$250.00 \$250.00	0.8 4.1	\$1,025.00	Begin preparation for hearings on motions for reconsideration and
10/20/2015	5	\$250.00			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 \$175.00	Analyze client responses  Oraff/analyze/adit changes in B. No. Flect
10/20/2015	10	\$250.00	0.7	\$175.00	Oraft/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	
10/20/2015	10	\$250.00	0.1	\$25,00	
10/20/2015	15	\$195.00	0.7	\$136.50	
10/21/2015		\$195.00	0.9	<b>\$</b> 175.50	
10/21/2015	15 15	\$195.00	0.5	\$97.50	Research regarding business record exception to hearsay rule
10/21/2015		\$250.00	2.2	\$550.00	Continue preparation for hearings on motions for reconsideration and
10/22/2015	5	\$230.00	2.2	2000000	second summary judgment motion
10/00/00/15	6	\$250.00	3	\$750.00	Travel to Sandpoint, Idaho
10/22/2015			5.1	\$1,275.00	Analzye briefing and prepare for hearing on motion for summary
10/22/2015	10	\$250.00	<b>J</b> . 1	4 - 127 0.00	judgment
	40	\$250.00	2.9	\$725.00	Travel to Spokane, Washington
10/22/2015	10		2. <del>3</del> 5	\$1,250,00	Appear for/attend hearings on motions for reconsideration and second
10/23/2015	6	\$250.00	3	\$1,200,00	summary judgment motion
	6	\$250.00	1	\$250,00	Telephone conference with clients regarding outcome of hearings
10/23/2015			3	\$750.00	Return travel to Boise, Idaho
10/23/2015	6	\$250.00 \$250.00	7.5	\$1,875.00	Prepare for hearing and attend hearing and argue motion for
10/23/2015	10	\$250.00	7.3	\$1,010.000	summary judgment
		tara aa	3	\$750.00	Travel to and from Spokane, WA to Sandpoint, ID
10/23/2015	10	\$250,00 \$250.00	3.8	\$950.00	Travel from Spokane, WA to Boise, ID
10/24/2015	10		0.9	\$175.50	Review mortgages
10/26/2015	15	\$195.00	2,9	\$725.00	Correspondence with D. Kreifeis
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	- 5	\$250.00		\$275.00	Analyze previously propounded rogs and rips
10/26/2015	10	\$250.00	1.1	\$775.00	Draft/analyze/edit rfps and rogs to defendants VP, NIR and JV
10/26/2015	10	\$250.00	3,1	\$200.00	Draft/analyze/edit expert witness disclosures
10/26/2015	10	\$250.00	0.8	\$200.00 \$100.00	Coordinate resumes and other information from experts for expert
10/25/2015	10	\$250.00	3.4	\$300,00	
				2100.00	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 small from M. Hathaway; telephone conference with M.
					Hathaway regarding expert wilness duties; conference call
					with M. Hathaway and O. 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	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
10/26/2015	10	\$250.00	0.6	\$150,00	Compile documentation for D. Shafar
10/28/2015	10	\$250.00	0.3	\$75.00	Analyze email from court clerk
10/29/2015	10	\$250.00	1.8	\$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
10,00,20.0		* - *			Recognition filed in R.E. Loans Texas bankruptcy
10/30/2015	5	\$250.00	6.0	\$200.00	Review and respond to correspondence from D. Kreifels
10/30/2015	10	\$250.00	0.8	\$200,00	Analyze amails and voicemail from G. Edson and leave voicemail in
10,00,20 10					response to the same
11/02/2015	15	\$195.00	2,1	\$409.50	Reviewlanalyze 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	0.8	\$150.00	Telephone conference with G. Edson
11/02/2015	10	\$250.00	0.4	\$100.00	Telephone conference and email with client
		****	0.3		Continue Review of RE Loans bankruptcy
11/03/2015	15 10	\$195.00 \$250.00	0.8		Analyze letter from G. Edson
11/03/2015 11/03/2015	10	\$250.00	0.3		Telephone conference and email with client
	10	\$270,00	1.2		Analyze emails from M. Hathaway, respond to same
11/03/2015	,0	<b>42</b> : 0,00	****	40-111	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;
1 110-1120 10		42.0.05			telephone conference with
					Bonner County regarding tax parcel issues; draft/analyze small to B.
					Haberman
11/05/2015	10	\$250.00	0.9		Analyze availability and strategy for taking depositions and leave
: 1/03/20 (0	,0	Q2.00,00	3.5	7	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
11/05/2015	10	<b>GEOGRAP</b>	<b>9</b> , <b>9</b>	7.20,00	regarding deposition
11/05/2015	10	\$250.00	0.4	\$100.00	telephone conference with P. DeAngell regarding scope of Lynskey
( )(G)(Z) (G	1.0	<b>42.00.00</b>	uF		testimony
11/05/2015	10	\$250.00	0.3		Telephone conference with P. DeAngeli
11/05/2015	10	\$250.00	1,2	\$300,00	Analyze Sandpoint Title documents and email from M. Hathaway
11/05/2015	· U	\$2.50,00	1.4E	4000,012	and telephone conference with Mr. Halhaway
44400004		\$255 OA	0.3	\$75,00	Revise correspondence with Fidelity
11/10/2015	6	\$250.00	0.3 3.7		Analyze FATCO documents and draft deposition outlines for the same
11/10/2015	10	\$250.00			Analysis of Court's Decision regarding 3rd MSJ and other motions
11/11/2015	15	<b>\$</b> 195.00	1		heard on October 23, 2015

NIR's GRAND TO	OTAL:		390.03	\$86,417.50	
NIR's Pro Rata S	Share	33.3%	249.93	\$56,222.00	
Subtotal of Fees	;		749.80	\$168,666.00	
7/5/2016	17	\$90,00	8	\$720.00	Finalize work in connection with exhibits to to memorandum of costs
7/5/2016	10	\$250.00	7,1	\$1,775.00	Analyze/draft/finalize motion for fees/costs
7/4/2016	17	\$90.00	11,75	\$90.00	Finalize spreadsheets and identification of invoices in support of memorandum of costs and fees
7/3/2016	17	\$90.00	8.75	\$90.00	memorandum of costs and fees; incorporate data within memorandum
7/2/2016	17	\$90.00	11	<b>\$90.</b> 00	memorandum of costs and fees
7/1/2016	17	\$90.00	5,5	\$90,00	memorandum of costs and fees
7/1/2016	10	\$250.00	0.5	\$125.00	telephone conference with client
6/30/2016	10	\$250.00	7.8	\$1,950.00	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
6/28/2015	10	\$250.00	8.7	\$1,675,00	
3/27/2016	10	\$250.00	6,3	\$1,575,00	confer with J. Sykes; compile invoices Analyze/draft/edit metion for rees/costs
6/24/2016	10	\$250.00	6.1	\$1,525.00	analyze fee/cost invoices; telephone conference with B. Haberman;
5/23/2016	10	\$250,00	5.6		
12/02/2015	5	\$250.00	0.9	\$1,400.00	
11/11/2015	6	\$250.00	0.0	\$225.00	Review/analyze order on summary judgment motion

#### EXHIBIT D

### Subsection D-1 VALIANT FORECLOSURE Fees Attibuted to VP

Trans Date	Atty	Rate	Hours to Bill	Amount	
08/06/2014	10	\$270.00	3,4	\$918.00	Haberman; research foreclosure statutes; analyze VP documents; draft, analyze and edit five notices of substitution of counsel for Walls Fargo; telephone conference with P.
10/08/2014	10	\$270.00	3,1	\$837.00	Ware regarding same; email Messrs Brennan and Haberman Analyze VP motion to dismiss; confer wl J. Sykes; outline apposition to mation to dismiss; email R. Lynskey
10/09/2014	10	\$270,00	1.7	\$459.00	Analyze // P 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	*	\$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; to 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	\$1,323.0 <u>0</u>	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	5	\$160.00	1.1	\$176,00	Revise opposition to motion to dismiss/motion to amend and supporting pleadings
11/03/2014	8	\$270.00	2.4	\$648.00 \$81.00	Final motion to amend and supporting pleadings; correspondence with client Analyze email from client; respond to same
11/03/2014 11/04/2014	10 10	\$270.00 \$270.00	0.3 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 1.8	\$81.00 \$405.00	Client conference call  Continued research regarding foreclosure
11/06/2014	15	\$225.00	0.3	\$67.50	Strategy conference with C. Tipton
11/07/2014	15	\$225.00	7.1	\$710.00	Research regarding foreclosure issues
11/07/2014	18 18	\$100.00 \$100.00	3.2	\$320.00	Draft research memorandum; confer with C. Nicholson regarding same
11/10/2014 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
11/13/2014	10	\$270.00	0.9	\$243.00	filed by VP, Inc.; draft objection to VP's request for an extension Analyze pleading filed by VP requesting telephonic appearance; telephone conference with P. Ware regarding current counsel for MFOB 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
11/17/2014 11/17/2014	ਤੇ 10	\$270,00 \$270.00	1.1 1.3	\$297.00 \$351.00	court's order granting VP's request for an extension Study pleadings related to motion to amend Analyze pleadings filed by VP in opposition to motion to amend; email
11/18/2014	6	\$270.00	4.6	\$1,242.00	same to client; analyze smails 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 MF08 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
11/19/2014	6	\$270.00	12.8	\$3,456.00	of VP's motion to dismiss 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 counset
11/19/2014	10	\$270.00	1.7	\$459,00	regarding stipulations to priority and itiligation scheduling 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
12.12.10		,			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 Villelli 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 Villelli in support of the same; leave voicemail for Bonner County Sheriff
10/06/2015	10	\$250.00	1.4	\$350.00	Analyza/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 form VP and NIR Outline responses to VP's discovery requests and draft/analyze emails
11/23/2015	10	\$250.00	3.4	\$850.00 \$600.00	Outline responses to VP's discovery requests and value transport to client requesting documents and and responses to the same Analyze/draft/edit responses to VP requests for production and
11/25/2015	10	\$250.00	2.4 8.7	\$2,175.00	Analyzerdraft/finalize answers to VP rogs, rfas, and rfps; analyze
11/30/2015	10	\$250.00	0.4	\$78.00	documents from client; meet with S. Sawyer  Draft meet and confer to Susan Weeks regarding expert disclosure of
12/01/2015	15	\$195.00 \$195.00	1	\$195,00	Annelte Brule Analysis of VP's supplemental expert witness disclosure
12/07/2015	15	\$270.00	2.1	\$567.00	Analyze documents produced by NIR and VP in discovery
12/14/2015	10 10	\$250.00	2.9	\$725.00	Telephone conference with B. Haberman and B. Kramer;
12/17/2015	10	3230.00		,	analyze NIR and VP documents
12/23/2015	10	\$250.00	2,6	\$650.00	Analyze Vallant/RE Loans/Pensco/MF08 documents; analyze NIR/VP's oppositions to Vallant'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 NIRAP (3.2); begin drafting reply in support of motion in Limine regarding NIRAP (2.9)
04/45/20140	10	\$250.00	5.9	\$1,475,00	Analyze VP witness list; analyze VP exhibit list; search
01/15/2016	10	\$200.00	0.0	21,11.002	Concordance database; telephone conference with J. Sykes; coordinate discussion with C. Reeves; telephone conference with client; telephone conference with D. Penny:
					prepare for trail
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 trait exhibits; multiple telephone conferences with Greenspain/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 property; conferwith J. Sykes
05/12/2016	10	\$250.00	0.3	\$200.00	Analyze email from S. Weeks requesting extension; confere 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
05/16/2018	10	\$250.00	6.4	\$1,800.00	Draft Letter to counsel for VP requesting immediate production of closing argument; analyze emails from client; telephone conference with client; telephone conference with client; analyze closing argument filed by VP, Inc.; outline rebuttal; confer with J. Sykes
Subtotal of Fe	es		171,00	\$39,594.50	
Jantolai Vi Pe				* *	

## Subsection 8-2 VALIANT FORECLOSURE Fees Altibuted 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	
11/16/2015	15	\$195.00	0.6	\$117.00	
11/16/2015	10	\$250.00	1.8	\$400,00	review of NIR Answers to lrogs 13-23 and REPs 7-20 (0.1)  Analyze Sandpoint Title documents;
11/10/2013	10	4200.00	1.0	\$400.0¢	analyze analis from C. Reeves
11/16/2015	10	\$250,00	0.2	\$50.00	
11/16/2015	10	\$250.00	5.2	\$1,300.00	
					analyze documents from C. Reeves; confer with title company;
11/17/2015	10	\$250.00	5.9	\$1,475.00	analyze document from title company  Analyze Sandpoint Title and C. Reeves documents
11/18/2015	10	\$250.00	4.1	\$1,025,00	
11/18/2015	6	\$250.00	0.5	\$125,00	
11/18/2015	10	\$270.00	2.3	<b>\$62</b> 1.00	
					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	
					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	
11/20/2015 11/23/2015	10 6	\$250,00 \$250.00	0.7 1.7	\$175.00 \$425.00	
11/24/2015	10	\$250.00	3.8	\$900,00	
11/25/2015	18	\$250.00	1.5	\$375.00	
					depositions and mediation
11/25/2015	10	\$270,00	0,3	\$81,00	
11/30/2015 12/01/2015	6 10	\$250.00 \$250.00	0,9 4.1	\$225.00 \$1,025.00	
120172010		<b>\$250.50</b>	7.1	\$1,020,00	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 amail to opposing counsel regarding discovery responses; draft/analyze and adit amails to C. Reeves and B. Ng
					regarding depositions; draft/analyze/edit email to D. Martice 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	
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
12/07/2015	10	\$270.00	1.6	\$432.00	firm; email B. Ng regarding deposition
120712013	10	\$270.00	1.0	3432.00	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 apposing 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;
		****		24 207 20	talephone 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 amail 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
12/11/2015	10	\$250.00	3.3	\$825,00	the same 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		Analyze client amails/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
12/14/2015	15	\$195.00	7.8	\$1,482.00	availability; analyze email from Fidelity; analyze Sage Holdings' claims Research regarding and draft Motions in Limine
12/15/2015	15	\$195.00	5		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		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		Correspondence and telephone conference with D. Penny; provide
12/21/2015	10	\$250.00	5.6		additional documents requested by D. Penny Calculate estimated attorney fees through trial and email the same to
· 4/4 // 6/4			V.0		attorney for First American Title, confer with C. Nicholson regarding
					trial deadlines for briefing; compile FATCO documents;
					email the same to Streamline imaging; email 0.
					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
					and a series and a series and a series and a series of the series and and a series

12/22/2015	10	\$250.00	5.2	\$1,300.00	Anaiyze letter from First American; anaiyze/edit/draft email to clients; anaiyze client response; anaiyze C. Reeves documents;
					draft deposition notices for R. Lynskey and C. Linscott
12/28/2015	10	\$250.00	3.3	\$825.00	
					analyze email from client; respond to same; telephone conference with clients; emails to apposing
					counsel regarding availability of expert for deposition
12/28/2015	15	\$195.00	4.5	\$897.00	Finish drafting response in support of motion in Limine regarding VPNIR (3,4); draft response in support of motion in Limine regarding
	_	****		\$07E 90	JV (1.2) Review and revise motion in limine reply memoranda
12/28/2015	- 6	\$250.00	1.1 2.8	\$275.00 \$700.00	E-mail C. Reeves and B. Ng regarding depositions of the same;
12/29/2015	10	\$250.00	2.5	¥ 00.00	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 Streamtine 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;
12/30/2015	ט	\$200,00	2.2	4000.00	begin trial preparation; research evidence issue;
					confer with R. Stacey regarding trial preparatioon
12/31/2015	10	\$250.00	5,2	\$1,300.00	Continue to identify FATCO documents that need to be blown up for trait; analyze/identify trait exhibits; draft/ediffanalyze casemap outlines in preparation for trial; analyze court order regarding motions in firmine: confer with C. Nicholson regarding the same
04/04/0040	6	\$250.00	0.6	\$150,00	Begin preparation for deposition of C. Reeves
01/04/2016 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	5	\$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	
01/07/2016	6	\$250,00	1.9	\$475.00	Continue preparation for C. Reeves deposition
01/07/2016	\$	\$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 depotopics; 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
044410040	-	\$250.00	6.2	\$1,550,00	prepare for deposition of B. Ng Multiple telephone conferences with C. Reeves; telephone conference
01/11/2018	5	\$250.00	U.E.	\$ 1/350230	with S. Weeks regarding depositions; correspondence to counsel regarding deposition changes; study Valiant documents for Reeves deposition; orepare 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; adit/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 Soise, 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 dos; 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	31,200.00	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. Bruie 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
01/14/2016	10	\$250.00	4.8	\$1,200.00	Spokane; telephone conference with clients Telephone conference with D. Penny;
0117472070		<b>,</b>		- ,	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. Marfice regarding the same;
					analyze/adil/finalize exhibit list; analyze trial exhibits for production;
			2.5	\$350.00	analyze/draft/edit witness list Research certification of business records
01/14/2016 01/14/2016	18 18	\$100.00 \$100.00	3.5 2.5	\$250.00	
01/14/2016	6	\$250.00	9.8	\$2,450.00	Attend deposition of Annette (Tony) Brule; prepare for
24 (45/2018	6	\$250.00	11	\$2,750.00	Chuck Reeves for deposition; telephone conference with client Attend deposition of Chuck Reeves; travel to Spokane, WA; study
01/15/2016		\$230.00	1 4	\$2,730.00	deposition exhibits; telephone conference with R. Stacey
01/16/2016	6	\$250.00	4	\$1,000.00	Return to Boise
01/16/2016 01/13/2016	6 15	\$250.00 \$195.00	1 2.8	\$250,00 \$546,00	Correspondence to obtain documents re insurance  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;
51,20,20					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	\$1,300.00	Letter to D. Penny; telephone conference with Chuck Reeves;
					review document from C. Reeves;
					update trail exhibits; revise trial brief; review JV Exhibit List and VP Exhibit List; telephone conference with Greenspain/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
04/24/2046	10	\$100.00	2,9	\$290,00	research untruthful acts subject to extrinsic evidence Research legally operative fact; research
01/21/2016	18	\$100,00	2,9	9290.00	IRE 803(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;
01/22/2016	10	\$250.00	6.6	\$1,650.00	revise trial brief Analyze deposition transcripts; compile documents/exhibit binders to
01,22/20:0	10	φ2,30.00	4.5	\$7,000.00	ship to Sandpoint; identify equipment to ship to Sandpoint;
					confer with IT company regarding the same; analyze email from H.
01/22/2016	6	\$250.00	6.3	\$1,575,00	Spector; confer with C, Tipton; analyze deposition exhibits Continue preparing for trial; study trial exhibits; telephone conference
01,222013	•	<b>\$</b> 245.00		* 1,- 1 - 1 - 1	with Chuck Reeves; conference with Adjuster's International; begin
	40	\$250.00	6.7	\$1,675.00	review of Brule and Reeves deposition transcripts  Prepare for trait
01/24/2016 01/24/2016	10 18	\$100.00	0.4	\$40.00	E-mail regarding cross complaint; follow-up records affidavit
01/24/2016	6	\$250.00	3.9	\$975.00	Trial preparation; prepare new exhibit 55; telephone conference with
01/25/2016	15	\$195.00	0.7	\$136.50	Chuck Reeves; prepare direct exam of Chuck Reeves Draft memoranda of law
01/25/2016	10	\$250.00	9.9	\$2,450.00	Prepare for trial
01/25/2016	6	\$250.00	4.2	\$1,050,00	Continue trail preparation; review Deeds of Trust;
					finalize Exhibit 65A; conference with P. DeAngeli
01/26/2016	10	\$250.00	13.1	\$3,275.00	Travel from Boise to Sandpoint; telephone conference with client;
24:20:2048	_	gaza aa	14	\$3,500.00	analyze exhibits and direct testimony; trial preparation Travel to Sandpoint, Idaho; trial preparation
01/26/2016 01/27/2016	6 15	\$250.00 \$195.00	,,4	\$0.00	Deal with original exhibit issues (1.4); review VP's Motion to Amend
01/27/2016	10	\$250.00	14.3	\$3,575.00	Meeting with B. Ng; meeting with C. Linscott; meet with client;
01/27/2016	5	\$250.00	10.5	\$2,325.00	otherwise prepare for trial  Trial preparation; prepare trial examination; telephone call to witness
0112712010	•	<b>4250.</b> 00	10.0	02,020,00	identified by JV and VP; meet Bill Haberman
01/28/2016	15	\$195.00	3.4	\$663,00	Research and revise memoranda regarding depositions and res judicata effect; review loan documents
01/28/2016	10	\$250,08	14.7	\$3,675.00	Attend trial; argue opposition to motion to amend;
* ,					prepare for opening statements; meet with witness;
01/28/2016	8	\$250.00	12.5	\$3,125,00	meet with witness; trial preparation Trial preparation for second day of trial
01/29/2018	15	\$195.00	1.5	\$292.50	Review documents; review Finney offer to purchase;
24/00/0040	40	tara on	n o	\$2,450.00	telephone conference with and email to Phil DeAngeli Prepare for trial; attend trial; redirect examination of B, Ng, direct
01/29/2016	10	\$250.00	9.8	\$2,400,00	examination of C. Linscott; redirect examination of C. Linscott
01/29/2016	6	\$250.00	11	\$2,750.00	Second day of trial
01/30/2016	10	\$250.00	3,9	\$975.00	Box exhibits, documents, binders, etc and mail to Boise, (D) travel from Sandpoint to Boise. (D)
01/30/2016	6	\$250.00	7	\$1,750.00	Meet with Bill Haberman; travel to Boise
02/01/2016	10	\$250.00	4.1	\$1,025.00	Analyze status of trial; telephone conference with D. Penny
02/01/2016	5	\$250.00	0.2	\$50:00	Telephone conference with D. Penny Telephone conference with D. Penny
02/04/2016	10	\$250.00	3.1	\$775.00	Analyze boxes from Sandpoint and verify everything was received from
ogipeino-re	10	\$250 DD	2.1	\$525.00	UPS Analyze email from client and respond to the same; analyze trial
02/05/2016	10	\$250.00	<b>≤</b> → (	<b>3020.00</b>	notice; outline issues for on redirect
02/05/2016	6	\$250.00	0.5	\$125.00	Correspondence with D. Penny; correspondence with court reporter
02/08/2016	10	\$250.00	2.1	\$525.00	and counsel regarding transcript  Analyze pleadings for potential default issues; analyze email from client;
J210012010		W.OU.VI		+540.00	Committee Committee on Section animals incomed accessing accessing

					04 )
20,000,000		than an	0.8	\$200.00	draft/analyze response to same; confer with J. Sykes Correspondence regarding chain of title
02/08/2016 02/16/2016	5 10	\$250,00 \$250,00	0.a 6.1	\$200.00 \$1,525.00	
02/10/2010	, 0	<b>\$230,50</b>	<b>3.</b> :	3.,025130	analyze email and letters from First American; analyze/draft
					amail to P. DeAngeli; analyze response to same;
					analyze email from court reporter; analyze client documents;
					analyza Reeves documents
02/18/2016	10	\$250.00		\$0.00	
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	
02/29/2016	6	\$250.00	4,4	\$1,100.00	
03/01/2016	6	\$250.00	4,2	\$1,050.00	Prepare trial testimony; correspondence with C. Reeves;
					correspondence to P. BeAngeli; review Eagle Pointe documents
03/01/2016	10	\$250.00	3.1	\$775,00	
					documents; analyze Eagle Pointe issues;
	_	2050 20		Ø550.00	analyze FATCO documents; analyze trial issues
03/03/2016	6	\$250,00	2.2	\$550.00 \$525.00	
03/04/2016	6 6	\$250.00 \$250.00	2.1 0.3	\$75.00	
03/07/2016 03/07/2016	10	\$250.00	5.2	\$1,300.00	
03/08/2016	10	\$250.00	2.9	\$725.00	
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	
03/11/2016	10	\$250,00	5.1	\$1,275.00	Prepare for trial
03/12/2016	6	\$250.00	2.1	\$525.00	
03/12/2016	10	\$250.00	4.3	\$1,075.00	Prepare for trial Prepare for trial
03/13/2016	10 6	\$250.00	4,7 1	\$1,175.00 \$250.00	•
03/14/2016	18	\$250,00 \$100,00	2,1	\$210.00	Research release of lots
03/14/2016 03/14/2016	10	\$250.00	8.7	\$1,875.00	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 \$1,625.00	Review loan documents Return to Boise from Sandpoint
03/18/2016	5 10	\$250,00 \$250,00	6.5 4.3	\$1,075.00	Travel to Boise, Idaho from Sandpoint, Idaho
03/18/2016 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	5.4	\$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	5.5 7.1	\$1,625.00 \$1,775.00	Analyze/edit/finalize written closing argument Draft/analyze/edit written closing argument; analyze admitted exhibits
04/12/2016	10 10	\$250.00 \$250.00	7.1 5.8	\$1,700.00	Draft/analyze/edit written closing argument; analyze admitted exhibits;
04/13/2016	10	\$200.00	9.0	\$1,700.00	research legal issues;
					analyze/draft/finalize affidavit of B. Haberman; analyze spreadsheets;
					analyza/draft amail 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;
	40	<b>20</b> 50.00	2.4	#000.00	analyze/finalize affidavit of B. Haberman Several emails to D. Shafer; analyze responses to same
04/21/2016	10	\$250.00	2.4 4.3	\$600.00 \$1,075.00	Analyze spreadsheet identifying lots;
04/22/2016	10	\$250,00	4,3	91,013.00	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 exibihits; telephone conference with C. Piehl;
					email to C. Piehl; analyze response to same;
					analyze lit guarantee; analyze/draft small to C. Plehl;
					analyze notice from Supreme Ct. re: dates for Trestle Creek hearing;
04/00/0040	10	2050.00	1.5	\$475.00	email same to clients  Analyze email and attachments from C. Piehl; email D. Shafer;
04/26/2016	10	\$250.00	1.9	94/J.UU	analyze email from D. Shafer; email D. Shafer; analyze email
					from B. Haberman
04/27/2016	10	\$250.00	2.9	\$725.00	Analyze amails from B. Haberman; respond to same;
V-12112010	, ,	<b>\$200.00</b>	<u></u>		analyze motion to strike filed by VP, Inc.;
					analyze/draft amail 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	9.8	\$200,00	Analyze amail from D. Shafer;
					telephone conference with D. Shafer;
					analyza email from the court; email to client

Subtotal of Fe	es		794.90	\$192,557.50	anaysa, arabin anas proposal stables at care
6/22/2016	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
8/21/2016	10	\$250.00	6,7	\$1.675.00	forward the same to clients; continue research; draft/analyze/edit motion for proposed order of sale Analyze/draft/edit memorandum in support of motion for order of sale
6/20/2016	10	\$250.00	7.2	\$1,800.00	Analyze disaster clean-up issues; telephone conference with court clerk; analyze/edit/draft changes to judgment and foreclosure decree;
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;
6/9/2016	10	\$250.00	9.1	\$2,275.00	Draft/analyza/edit judgment and decree of foreclosure
6/8/2016	10	\$250.00	0.4	\$100.00	research post-decision molions; draft judgment and order of sale Analyze email from client; respond to the same; confer with C. Tipton
05/31/2016	10	\$250.00	4.4	\$1,100.00	Analyze amails from clients; respond to same;
05/31/2016	6	\$250.00	0,5	\$125.00	email D. Penny; analyze response 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;
05/27/2016	5	\$250.00	2.2	\$550.00	Review Court's Memorandum Decision; telephone conference with clients
05/26/2016	10	\$250.00	5.2	\$1,550.00	Analyze /edit/finalize reputtal arguments; analyze amails from clients
05/13/2016 05/26/2016	6	\$250.00	1,2	\$300.00	correspondence from B. Kramer
05/12/2015	6 6	\$250.00 \$250.00	3.3	\$825.00	Review closing arguments of JV and VP; research issues;
05/*1/2016	10	\$250:00	0.6 0.7	\$150.00 \$175.00	Analyze email from client; telephone conference with client Review correspondence from W. Haberman
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
05/09/2016	10	\$250.00	1.9	\$475.00	Analyze email from D. Shafer; analyze parcel spreadsheet and lot releases/partial lot releases; email D. Shafer
05/05/2016	10	\$250.00	1 1	\$275.00	Analyze /draft/edit email to C. Piehl; analyze email from D. Shafer
05/04/2016	10	\$250.00	1.9	\$475.00	
05/03/2016	10	\$250,00	3.3	\$825.00	Ouiline properties subject to the RE Loans, Pensco, MF08 mortgages and the Redemption Deed; draft/analyze
00/02/2010	.0	<b>9230.00</b>	,,	<b>3</b> 11105333	RE Loans, Pensoo and MF08 mortgages; identify properties subject only to RE and the Redemption Deed, properties only subject to Pensoo and the Redemption Deed; properties only subject to Pensoo and MF08 and the Redemption Deed; analyze properties only subject to MF08 and the redemption deed.
05/02/2016	10	\$250.00	4.4	\$1,100.00	and attachment; analyze arrail from client Prepare for drafting final judgment by analyzing properties subject to
04/29/2016	10	\$250.00	0.4	\$100.00	Analyze order from Court denying motions to strike Haberman affidavit

### Subsection 0.3 VALIANT FORECLOSURE Fees Altibuted 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	8	\$250.00	0.2	\$50.00	Telephone conference with S. Weeks
02/23/2015	8	\$250.00	4	\$1,000,00	Prepare reply memorandum to NIR/VP summary judgment opposition
03/05/2015	5	\$250.00	5.2	\$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	8	\$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	18	\$100.00	5.1	<b>\$6</b> 10.00	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
98/17/2015	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	[0]	\$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	<b>3</b> 621.06	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 seme; email D. Shafer and S.
					Haberman regarding conference call; email R. Lynksey; analyze response;
					email D. Stapels
08/04/2015	10	\$270.00	3.4	\$918.00	
					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
98/10/2015	18 10	\$100.00 \$270.00	2.8 3.1	\$280.00 \$837.00	
08/10/2015	10	\$270.00	J. ,	9037,000	prepare for and participate in conference
					call with R. Myers and H. Brooks; confer with C.
08/10/2015	15	\$225.00	6.4	\$1,440.00	Nicholson and C. Tipton regarding status of legal research Research regarding subrogation and redemption
08/11/2015	18	\$100.00	2.9	\$290,00	
	4.5	****	2.7	#700 00	research inverse alienation
08/11/2015	10	\$279.00	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 18	\$270.00 \$100.00	1,2 4,8	\$324.00 \$480.00	
08/12/2015 08/12/2015	15	\$225.00	2,9	\$652,50	
08/13/2015	18	\$100.00	6.2	\$620.00	
08/13/2015	10	\$270,00	<b>6</b> ,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 0.
					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
08/17/2015	18	\$100.00	9.5	\$950.00	sale 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
20/47/00/47	4-	2000 00	4.5	\$967.50	support of motion to reconsider order of sale and decree of foredosure Revise memo supp reconsider order of sale; additional research
98/17/2015	15	\$225.00	4,3	4307.50	regarding marshalling of assets
08/17/2015	6	\$270.00	1.1	\$297.00	Confer with R. Stacey regarding foreclosure procedure; study
08/18/2015	18	\$100.00	2.5	\$250.00	correspondence from D. Shafer Research marshalling of assets
08/18/2015	10	\$270.00	8.1	\$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; amail 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	8,6	\$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 atter/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	6 10	\$250.00 \$250.00	0.4 1.1	\$100,00 \$275,00	Prepare meet and confer correspondence to S. Weeks Analyze VP/NIR motions to reconsider
09/30/2015 09/30/2015	10	\$250.00	2.8	\$700.00	Analyze/draft/edit opposition to VP/NtR'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
10/13/2015	10	\$250.00	1.1	\$275.00	the motions to reconsider  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 10/14/2015	10 10	\$250.00 \$250.00	0.4 1.5	\$100.00 \$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 NIRAVP's Rule 56(f) & Motion Extend Time under Rule 6(e)(1)

VP's Pro Rata	Share	50%	103.35	\$22,466.00	
Subtotal of Fee	es		206.70	\$44,932.00	
11/05/2015	10	\$250.00	0.5	\$125.00	telephone conference with S. weeks regarding deposition availability and analyze small from S. Weekes regarding the same
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
10/28/2015	10	\$250.00	0.2	\$50.00	Email the same to client
10/28/2015	10	\$250.00	1.1	\$275.00	Analyze discovery requests from NIR and VP
10/27/2015	10	\$250,00	0.2	\$50.00	Analyze email from S. Weeks regarding deposition dates for NIR and VP
10/21/2015	10	\$250.00	0.5	\$125.00	Oraft/analyze/finalize molions to strike and memoranda affidavite in support of the same
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	15	\$195.00	1.9	\$370,50	Reply to NIR-VP's Opp to Vallant's First Motion to Strike
10/20/2015	15	\$195.00	0.4	\$78,00	Research Re: 56(f) standards
10/19/2015	10	\$250.00	0.2	<b>\$</b> 50.0 <b>0</b>	Email S. Weeks regarding deposition of NIR and VP
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
10/18/2015	15	\$195.00	2.6	\$507.00	Begin draft Reply to NIR/JV Opp to 3rd SJ Motion
10/18/2015	15	\$195.00	0.5	\$97.50	Analysis of NIR/VP opp to Valiant's 3rd SJ
10/16/2015	15	\$195.00	0.2	\$39.00	Analysis of NIR/VP opp 3rd SJ Motion
10/15/2015	15	\$195,00	2.9	\$565.50	Research regarding 56(f) requirements
				******	Decrees engaging EC/A comirographs

# Subsection 0-4 VALIANT FORECLOSURE Fees Attibuted Jointly to NIR, VP, and JV

Trans Hours to Bill Amount Date Atty \$378.00 Analyze pleadings and litigation issues
Telephone conference with G. Finney regarding 7 day extension to 09/02/2014 10 \$270.00 09/04/2014 10 \$270.00 0.8 \$216.00 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 Analyze email from C. Dodson; draft/edit acceptance of service; \$567.00 09/12/2014 10 \$270.00 2.1 analyze amail 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 itigation guarantee; email client \$160,00 0,6 \$96.00 Study matrix for deadlines; revise same Analyze/draft/edit affirmative defenses to JV cross claim; analyze/edit 09/17/2014 10 \$270,00 \$837.00 answer to JV, LLC claims; analyze motion filed by VP, LLC; t/c J. Breaux re: golf course; Vo and emails with client; confer w/ J. Sykes Strategy conference with R. Stacey 10/08/2014 \$160.00 0.6 \$96.00 Draft/analyze/edit motion to amend third party complaint; 2.3 \$621,00 11/20/2014 10 \$270.00 research same: analyze service issues Confer with R. Stacey; study scheduling order \$108.00 11/26/2014 a \$270.00 3.4 \$1,134.00 \$864.00 Begin study of real property record Continue study of real property records 12/03/2014 \$270.00 4.2 3.2 12/04/2014 \$270.00 Study pleadings in prior cases related to summary judgment motions Begin preparation of statement of facts for summary judgment motion 12/08/2014 \$918.00 \$270,00 \$918.00 12/09/2014 3 \$270.00 3.4 \$1,404.00 Study Reeves affidavil and pleadings; continue preperation of \$270.00 5 12/10/2014 statement of facts Analyze project documents; outline summary judgment arguments; draft notice of appearance on behalf of HLT and Independent \$702.00 \$270.00 2.3 12/11/2014 10 Mortgage; draft/analyze/edit stipulation to judgment against HOA and Panhandle Management 3.1 \$837.00 Research legal arguments for summary judgment motion and \$270.00 12/11/2014 ត supporting pleadings
Begin preparation of summary judgment motion and supporting \$594.00 2.2 12/12/2014 s \$270,00 pleadings; legal arguments
Continue preparation of summary judgment; revise statement of facis 7.4 \$1,998,00 \$270.00 12/15/2014 8 and legal argument Confer with J. Sykes; \$648.00 2.4 12/16/2014 10 \$270.00 analyze project documents; analyze legal description \$567,00 Research issues related to summary judgment motion 12/16/2014 6 \$270,00 2,1 Study research memorandum and related regulations \$270,00 4.2 \$1,134.00 12/16/2014 \$1,620.00 Continue preparation of summary judgment motion and supporting 12/17/2014 ô \$270,00 pleadings; telephone conference with J. Hamilton; study real property records Research motion for judgment on the pleadings
Prepare declarations to support summary judgment memorandum 0.6 \$162.00 12/22/2014 10 \$270.00 5918.00 12/30/2014 \$270.00 3.4 Prepare interrogatories, requests for production and requests for admission to propound upon JV, North Idaho Resorts and VP \$864.00 \$270.00 S 12/30/2014 \$243.00 Telephone conference with clients 0.9 \$270.00 01/05/2015 5 Continue preparation of summary judgment briefing 01/05/2015 \$270.00 3.1 1.2 \$837.00 \$324.00 Correspondence with client; research foreclosure sale issues 01/05/2015 a \$270.00 \$108,00 Confer with J. Sykes \$270.00 01/06/2015 10

01/09/2015	10	\$270,00	0.4	\$108.00	Confer with J. Sykes regardoing 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	
01/13/2015	6	\$270.00	3.3	\$891.00	
					pleadings
01/14/2015	6	\$270.00	5	\$1,350.00	
				** ***	summary judgment memorandum
01/15/2015	6	\$270.00	4.8	\$1,296.00	Revise summary judgment legal arguments; final declaration of
	_	****	• •	P0 477 00	Counsel
01/18/2015	6	\$270.00	3,5 2.9	\$945.00 \$725.00	Telephone conference with client; final summary judgment pleadings Prepare documents requested by client
01/16/2015	6	\$250.00	3.2	\$800.00	
01/20/2015	5 3	\$250.00 \$250.00	1,3	\$325.00	
01/20/2015	5	\$270.00	0.6	\$162.00	
01/21/2015 01/21/2015	6	\$250.00	2.7	\$675,00	
01/22/2015	3	\$250.00	0.5	\$125,00	
01/23/2015	6	\$250.00	2.5	\$625.00	Revise discovery requests (interrogatories, requests for production and
0 // 20/20 / 0	-	7			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	
02/05/2015	10	\$250.00	0,3	\$75.00	
02/05/2015	18	\$100.00	3,9	\$390.00	Draft research memorandum
02/06/2015	10	\$270.00	0.6	\$162.00	
02/09/2015	6	\$250.00	0.9	\$225.80	Prepare stipulation to reschadule summary judgment hearing
02/12/2015	6	\$250.00	0.2	\$50.00	Correspondence with S. Weeks and G. Finney regarding possible
		2050 10	2.2	\$225.00	settlement conference Correspondence with clients
02/13/2015	6	\$250.00	0.9	\$702.00	Correspondence with client; review plat map:
02/18/2015	6	\$270.00	2.5	\$102.00	telephone conference with D. Shafer
00140/2045	6	\$270.00	1,1	\$297,00	Correspondence with D. Shafer regarding expert issues
02/19/201 <del>5</del> 02/23/2015	10	\$250.00	0,9	\$225,00	
92:23/2013	,0	4230.00	9,4	<b>V</b> 020,00	same
02/23/2015	10	\$250.00	2,1	\$525.00	Review/analyze memorandums filed in opposition to client's motions
02.23/23 TO		\$200,00		*	for summary judgment
02/24/2015	6	\$250.00	4.2	\$1,050,00	Continue preparation of reply memoranda to summary judgment
420.00	_	*=			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	<del>0</del>	\$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		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 \$183.00	Review/analyze maps Towel in and from machine with D. Shefor
03/16/2015	10	\$270.00	0.6	\$162,00 \$459.00	Travel to and from meeting with D. Shafer Prepare for and attend meeting with D. Shafer regarding expert issues
03/16/2015	10	\$270.00	1.7 0.6	\$162.00	Analyze documents from D. Shaler
03/16/2015	10 8	\$270,00 \$270,00	0,2	\$54.00	Talephone conference with D. Shafer
03/16/2015	6	\$270.00	0,2	\$135.00	Review/analyze documentation prepared by D. Shafer
03/16/2015	10	\$250.00	0.2		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
03/17/2015 03/18/2015	5	\$250,00	6.5	\$1,625,00	Travel to Sandpoint, Idaho for summary judgment hearing and return
301:0/2013	•	3230100			to Spokane, Washington
03/18/2015	6	\$250,00	3,2	\$800.00	Prepare for summary judgment hearing
03/18/2015	5	\$250.00	9.7	\$175,00	Telephone conference with clients following summary judgment
					hearing
03/18/2015	6	\$250,00	3,5		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	5	\$250.00	2.1		Review correspondence from and telephone conference with D. Shafer
03/23/2015	8	\$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;
2010 1100 1	^	#970 OC	4.0	2400 AC	telephone conference with S. Nieman Correspondence with D. Shafer regarding expert issues;
03/24/2015	6	\$270.00	1.8	<del>3486</del> .00	correspondence with U. Sharer regarding expert issues;
00/04/0045	2	\$250.20	0.9	\$225.00	correspondence with clients regarding same Correspondence with D. Shafer
03/24/2015	6 <b>5</b>	\$250.00 \$250.00	0.6		Review matrix of properties
03/24/2015	6	\$250.00	0.3		Correspondence with clients
03/24/2015 03/25/2015	ð	\$250.00	0.2		Telephone conference with D. Shafer
03/25/2015	6	\$270.00	0.7		Correspondence with B. Kramer; telephone conference with J. Miller;
OUIZ-RZU IU	J	921 9.00	407		telephone conference with S. Nieman
03/25/2015	6	\$270.00	0.2		Telephone conference with D. Shafer regarding expert issues
03/26/2015	8	\$270.00	0.9		Telephone conference with D. Shafer, review documentation;
	-				correspondence with clients regarding same
03/26/2015	6	\$250.00	1.3		Prepare correspondence to D. Kreifels
03/26/2015	6	\$250.00	0.4		Review email correspondence
03/26/2015	6	\$250,00	0.4		Telephone conference with D. Shafer
03/25/2015	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	
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	
03/30/2015	10	\$270.00	2.1	\$567,00	
03/30/2015	3	\$270,00	1.6	\$432.00	Telephone conference with D. Shafer regarding expert issues;
					telephone conference with clients regarding same
03/31/2015	ອີ	\$250.00	0.8	\$200.00	Telephone conference with D. Shafer and W. Haberman
03/31/2015	6	<b>\$2</b> 70.00	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 \$108,00	Telephone conference with D. Shafer Telephone conference with S. Neiman
04/06/2015	5 10	\$270,00 \$270.00	0.4 2.7	\$729.00	Analyze documentation prepared by D. Shafer:
04/06/2015	10	3270.00	<u></u> 1	Ψ. 20.50	prepare outline regarding the same; telephone conference with D.
					Shafer regarding the same
04/08/2015	8	\$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	8	\$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
				#400.00	and analyze responses
04/17/2015	10	\$270.00	1.6	\$432,00	Prepare for and attend conference call with clients Telephone conference with 8. Kramer and others
04/17/2015	6	\$270,00	1.1	\$297.00 \$100.00	Correspondence with Fidelity
04/21/2015	6	\$250.00	0.4	\$972.00	Confer with J. Sykes regarding illigation
04/24/2015	10	\$270,00	1-6 1.3	\$351.00	Confer with R. Stacey regarding litigation
04/24/2015	6 10	\$270.00 \$270.00	0.9	\$243.00	Telephone conference with B. Haberman regarding summary judgment;
04/27/2015	10	\$210.00	0.5	Ψ <u>Ε</u> +0.00	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	Analyza emails from client; email client
00/31/2070		·			regarding the same
05/08/2015	10	\$270.00	3.5	\$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
			0.4	#470 CO	final judgment
06/18/2015	15	\$225.00	2.1	\$472,50	E-mail hearing update to B. Haberman; travel Spokane to Boise Research motion to reconsider
06/22/2015	15	\$195.00	2.8	\$546.00 \$370.50	Research motion to reconsider and opposition to summary judgment
06/22/2015	15	\$195.00	1,9 1,7	\$425.00	Analyze client documents and property records
06/23/2015 06/23/2015	6 6	\$250.00 \$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
00/20/2010	,,,	<b>\$20</b> 0.00		*=====	regarding the same
06/23/2015	10	\$250.00	0.4	\$100.00	Email dient
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
				207.50	Reconsider Research standard of review
06/24/2015	15	\$195.00	0.5	\$97.50	Research standard of review
06/24/2015	15	\$195.00	1.3 3.2	\$253.50 \$624.00	Continue drafting memoranda in opposition to JV/VP/NIR Motions to
06/25/2015	15	\$195,00	3.4	\$624.00	Reconsider
00/05/0045	4 =	\$195.00	0.8	\$156:00	Review of Chuck Reeves deposition from Union Bank case
06/25/2015	15 15	\$195.00	1.2	\$234.00	Research submission of admissible avidence
06/25/2015 06/26/2015	15	\$195.00	7.2	\$1,404.00	Continue Drafting memoranda in opposition to JV.VP/NIR Motions to
GOVEDIZOTO	, 0	4.00.00			reconsider
06/26/2015	5	\$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	õ	\$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
05/30/2015	10	\$270.00	1	\$270.00	Research statute of frauds Analyze/draft/edit/finalize affidavits in support of memorandums in
07/01/2015	10	\$250.00	2.8	\$700.00	opposition to motions to reconsider
07/00/0047	40	\$276 AP	0.3	\$81.00	Analyze emails from D. Shafer to R. Lynskey; email D. Shafer
07/02/2015	10	\$270.00	UD	<b>401.00</b>	regarding the same
07/04/2016	10	\$270.00	0.1	\$27.00	Analyze email from B. Haberman
07/04/2015 07/06/2015	10	\$270.00 \$270.00	2.4	\$648.00	Analyze site maps and other documents from D. Shafer; analyze
3119012013		par useu			multiple emails form D. Shafer, draft responses to same;
					(3) telephone conference with D. Shafer; small 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 appositions to motion to reconsider
07/06/2015	10	\$250.00	1.4	\$350,00	
07/07/2015 07/07/2015	10 10	\$250.00 \$250.00	3.1 0.3	\$775,00 \$75.00	Telephone conference with court clerk regarding waiver of objection for
07/07/2015	10	\$250,00	0.1	\$25.00	
07/07/2015	10	\$250.00	0.3	\$75,00	filing Email client regarding status
07/07/2015	8	\$270.00	0.6	\$162,00	
07/08/2015	6	\$270.00	0.9	\$243.00	
07/08/2015	15	\$225.00	0.2	\$45.00	
07/08/2015	10	\$270.00	0.6	\$182.00	
				******	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	<b>\$</b> 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 emeils 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 8. 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
01/20/2010	,,,	9270.00	3.,0	\$00,000	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	<b>\$</b> 315.00	Research water rights
07/24/2015	10	\$270,00	4.1	\$1,107.00	Analyze documents from B. Haberman; small 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
07/28/2015		\$0E0.00	0.0	200.00	motions for reconsideration
	10	\$250.00	0.2	\$50.00	Analyze emails from R. Meyers and S. 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	8.0		Email R. Myers regarding teleconference to discuss status of case;
					email 3. 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
07/04/00:=	40	\$050.00	7.4		court clerk regarding the same
07/31/2015	10	\$250.00	2,4		Analyze documents from Bonner County Assessor
08/03/2015 08/05/2016	10 10	\$270.00 \$270.00	1. <del>8</del> 11.6		Analyze utility easement documents Prepare for hearing; travel to Sandpoint, ID and back to Boise, ID;
00/03/2013	10	\$210,80	11.5		
					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; 3, Haberman regarding outcome of hearing
08/06/2015	18	\$100,00	6.1		Research foreclosure sales
08/06/2015	15	\$225.00	3.1		Research regarding foreclosure sales
08/08/2015	10	\$250.00	0.2		Analyze email from Fidelity
08/07/2015	18	\$100.00	5,5		Research credit bidding
09/02/2015	10	\$270.00	8.3		Travel from Boise, ID to Sandpoint, Idaho for the motion to
20,0220:0		·			alter/reconsider order of sale; prepare for hearing on Vallant's motion
					to alter or reconsider foreclosure decree and order of sale; confer with
					The second secon

					<li>J. Sykes regarding the same; telephone conference with clients;</li>
09/02/2015	5	\$250,00	2.7	\$675.0	
09/02/2015	6	\$250.00	3.2	\$800.0	
09/02/2015	6	\$250,00	1.7	\$425.0	
09/02/2015	6	\$250.00	1.6	\$400.0	
09/03/2015	6	\$250.00	3.2	\$800.0 \$50.0	
09/03/2015	10	\$250.00 \$250.00	0.2		
09/03/2015 09/03/2015	10 10	\$250.00	1 3	\$250.00 \$750.00	
09/03/2015	15	\$235.00	0.2	\$45.00	
09/04/2015	10	\$250,00	1,9	\$475,00	
09/08/2015	10	\$250.00	0.3	\$75.00	
09/08/2015	10	\$250.00	0.5	\$125.00	
09/10/2015	10	\$250.00	6.6	\$1,650.00	
		•=			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	
					and objection to proposed judgment
09/14/2015	6	\$250.00	1.9	\$475.00	
09/15/2015	15	\$195,00	0.2	\$39.00	
09/15/2015	15	\$195.00	8.0	\$156.00	
no (a mino a m	4.5	*405.00		*4.50.00	Agreement to prepare B. Ng Deci.
09/15/2015	15	\$195.00	0,8	\$156.00	
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	
08/10/2013	10	3100.00	3.0	\$330,00	declarations
09/16/2015	15	\$195.00	3,5	\$682.50	
09/17/2015	15	\$195.00	0.2	\$39.00	
09/17/2015	15	\$195,00	0.3	\$58.50	
00, , , , 20 , 0		2	0.0		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	<b>\$75.00</b>	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	Talephone conference with F. Elsaesser
09/17/2015	5	\$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
00/40/0045	45	2405.00	0.4	\$40.F0	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 foredosure
20/19/2015	18	\$100.00	1.2	\$120,00	
09/18/2015 09/18/2015	15	\$195.00	1.4 0.8	. \$156.00	Research regarding Inconsistent Deci. 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	5	\$250.00	1.4	\$350.00	Revise declaration of B. Ng
09/18/2015	3	\$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
301 141-0110		7		*	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 Dect.
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 8. 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 Deci.
09/22/2015	6	\$270,00	0.9	\$243.00	Correspondence with S. Rasor
09/22/2015	5	\$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 \$260.00	5.1	\$994.50 \$175.00	Continue draft Memo Supp 3rd MSJ
09/22/2015	6 6	\$250.00 \$250.00	0.7 1.4	\$175.00 \$350.00	Review and revise declaration of B. Ng Correspondence with G. Finney regarding depositions of C. Raeves
09/22/2015	¥.	9200.00	1.4	\$330.00	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	0.5	\$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 Deci.
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	\$50.0	0 Согrespondence wit S. Rasor
09/29/2015	10	\$250.00	2.7	\$675.0	
09/29/2015	10	\$250.00	0.7	\$175,0	
09/29/2015	10	\$250.00	1.3	\$325.0	
09/29/2015	6	\$250.00	1.2	\$300.0	
03/23/2013	,	92,00,00	1.2	\$500.0	Judgment motion
10/01/2015	10	\$250.00	3.6	\$900,0	
10/01/2015	10	\$250.00	0.6	\$150.0	
10/01/2015	10	\$250.00	1,1	\$275,0	
10/08/2015	10	\$250.00	0.7	\$175.00	
10/08/2015	10	\$250,00	0.8	\$200.00	
10/08/2015	10	\$250.00	0.5	\$125.00	
10/11/2015	10	\$250.00	0.2	\$50.00	
10/12/2015	10	\$250.00	0.6	\$150.00	
10/12/2015	10	\$250.00	0.3	\$75.00	
10/13/2015	10	\$250.00	0.3	\$75.00 \$75.00	
	15	\$195.00	0.7	\$136.50	
10/14/2015 10/14/2015	5	\$250.00	1.1	\$275.00	
	5	\$250.00	1.1	\$275.00	
10/14 <b>/2</b> 015 10/14/2015	10	\$250.00	1.3	\$325.00	
	10		0.9		
10/14/2015		\$250.00		\$225.00	
10/14/2015	10 10	\$250.00 \$250.00	0.4 0.4	\$100.00 \$100.00	
10/14/2015	10		•••		
10/14/2015	6	\$250.00 \$250.00	0.3	\$75.00 \$475.00	
10/15/2015			1.9		
10/15/2015	10	\$250,00	0.7	\$175.00	
10/15/2015	10	\$250,00	1.8	\$450,00	
10/15/2015	10	\$250.00	0.8	\$150,00	
10/15/2015	10	\$250.00	0.6	\$150.00	
10/15/2015	10	\$250.00	0.2	\$50.00	
10/15/2015	10	\$250.00	0.2	\$50.00	
10/15/2015	10	\$250,00	0.3	\$75.00	
10/15/2015	10	\$250.00	2.3	\$575.00	
10/16/2015	15	\$195.00	1.6	\$312.00	
					Extension of Time to reply and revise supporting Nicholson decl
10/16/2015	10	\$250.00	0.6	\$150.00	Analyze emails from 3. Haberman and 3. 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 little 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	1.3	\$351.00	Research breach of note/loan agreement
10/19/2015	10	\$250.00	1.7	\$425.00	Draft/analyze/edit affidavit of 8. 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	
					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	3	\$250.00	0,8	\$200,00	
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	
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	
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 3. Ng
10/20/2015	10	\$250.00	0.3	\$75.00	
10/20/2015	10	\$250.00	0.1	\$25.00	
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	
10/21/2015	15	\$195.00	0.5	\$97.50	Research regarding admissibility and use of impeachment evidence 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
: 3:22:20 10	J			4000000	second summary judgment motion
10/22/2015	a	\$250.00	3	\$750.00	Travel to Sandpoint, Idaho
10/22/2015	10	\$250.00	5.1	\$1,275.00	Analzye briefing and prepare for hearing on motion for summary
10/22/2013	10	\$230.00	J. :	31,270.00	
10/22/2015	10	\$250,00	29	\$725.00	Judgment Travel to Spokane, Washington
10/23/2015	6	\$250,00	4.9 5	\$1,250.00	
10/23/2013	3	\$2,00,00	3	91,200,00	Appear for/attend hearings on molions for reconsideration and second
10/22/2016	6	\$250,00	1	2250.00	summary judgment motion Telephone conference with clients regarding outcome of hearings
10/23/2015	6	\$250.00	3	\$250.00 \$750.00	
10/23/2015	10	\$250.00	7.5		Return travel to Boise, Idaho
10/23/2015	10	\$230.00	1.0	\$1,875.00	Prepare for hearing and attend hearing and argue motion for
10/33/3015	10	\$250.00	2	\$750,00	summary judgment Travel in and from Spokane, WA to Sandpoint ID
10/23/2015		\$250.00 \$250.00	3	\$950.00	Travel to and from Spokane, WA to Sandpoint, ID
10/24/2015	10		3.8		Travel from Spokane, WA to Bolse, ID
10/26/2015	15	\$195.00	9.9	\$175.50 \$705.00	Review mortgages
10/26/2015	6	\$250.00	2.9	\$725.00	Correspondence with D. Kreifets
10/26/2015	5	\$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
10/28/2015	10	\$250.00	1.1	\$275.00	Analyze previously propounded rogs and rips
10/26/2015	10	\$250.00	3.1	\$775.00	Draft/analyze/edit rfps 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 wilness 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 amail from counsel for First American; draft/analyze/edit response to the same
ADDIED1E	15	\$195.00	4.4	\$858.00	
10/27/2015 10/27/2015	10 10	\$250.00	5.3	\$75,00	
10/27/2015	10	\$250.00	0.3	\$75.00	
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	
10/28/2015	10	\$250.00	0,3	\$75,00	
10/28/2015	10	\$250.00	0.2	\$50.00	
10/28/2015	10	\$250.00	0.9	\$225.00	
10/28/2015	10	\$250.00	0.3 1.4	\$75.00 \$350.00	
10/28/2015	10	\$250.00	5 - <del>4</del>	9330,00	American and email the same to counsel for the same
10/28/2015	10	\$250.00	0.6	\$150.00	
10/28/2015	10	\$250.00		\$75.00	
10/29/2015	10	\$250.00	1.8	\$400,00	
10/29/2015	10	\$250.00	0,9	\$225.00	
10/29/2015	10	\$250.00	0.3	\$75.00	
10/29/2015	10	\$250.00	0.6	\$150.00	
10/29/2015	10	\$250,00	0,3	\$75,00 \$75,00	
10/29/2015	10	\$250.00	0,3 0.5	\$75,00 \$97.50	
10/30/2015	15	\$195.00	0.5	<b>J</b> 87,30	Recognition filed in R.E. Loans Texas bankruptcy
10/30/2015	3	\$250.00	0,8	\$200.00	
10/30/2015	10	\$250.00	0.8	\$200.00	Analyze emails and voicemail from G. Edson and leave voicemail in
1015012010	10	***************************************	***		response to the same
11/02/2015	15	\$195.00	2.1	\$409.50	Review/analyze R.E. Loans Bankruptcy filings
11/02/2015	5	\$250.00	1,6	\$400.00	
11/02/2015	10	\$250.00	0.6	\$150.00	
11/02/2015	10	\$250.00	0.4	\$100.00	Telephone conference and amail 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 0.3	\$150.00 \$75.00	Analyze letter from G. Edson Telephone conference and email with client
11/03/2015	10 10	\$250,00 \$270.00	1.2	\$324.00	Analyze emails from M. Hathaway; respond to same
11/03/2015	+0	\$270.00	1.4	. 4024.00	conference call with M. Hathaway and D. Shafer regarding same
11/04/2015	10	\$270.00	1.5	\$405.90	Telephone conference with B, Haberman;
11,04,2510	, ,	42			telephone conference with
					Bonner County regarding tax parcet issues; draft/analyze amail 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
	40	2050.00	0.4	\$100.00	regarding deposition talephone conference with P. DeAngeli regarding scope of Lynskey
11/05/2015	10	\$250.00	0.4	3:00.00	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 amail 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
5/23/2016	10	\$250,00	5.8 6.1	\$1,400.00 \$1,525,00	Research fees/costs Continue researching fees/costs; outline motion for fees and costs;
8/24/2016	10	\$250.00	Q. I	φ.,υ∠υ,υU	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	\$1,675.90	Continue to analyze/draft/edit motion for fees/costs
5/29/2016	10	\$250.00	7.3	\$1,825.00	Continue to analyze/draft/edit motion for fees/costs
5/30/2018	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	
		201		### C *	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
112/2010	1.5	400.00	1 3	¥0.5.50	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
Cubtotal of "-	ae.		749.80	\$168,666.00	
Subtotal of Fe	40		: TJ.00	y.00,000.00	
VP's Pro Rata	Share	33.3%	249.33	\$56,222.00	
				•	

921.73 \$214,561.25

VP's GRAND TOTAL:

Richard L. Stacey, ISB #6800

Jeff R. Sykes, ISB #5058

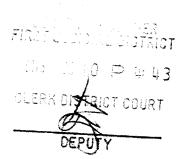
Chad M. Nicholson, ISB #7506

McCOnnell Wagner Sykes & Stacey Plic
827 East Park Boulevard, Suite 201

Boise, Idaho 83712

Telephone: 208.489.0100
Facsimile: 208.489.0110
stacey@mwsslawyers.com
sykes@mwsslawyers.com
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.

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 TO ALTER, AMEND
AND RECONSIDER THE
DECREE OF FORECLOSURE
AND JUDGMENT

Honorable Barbara A. Buchanan

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION TO ALTER, AMEND AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT | Page 1 [/1547.201/PLD/Post/Trial/VP Alter & Reconsider-Opposition Memo 160809.doc

COMES NOW, Valiant Idaho, LLC ("Valiant"), by and through its attorneys of record,

McConnell Wagner Sykes & Stacey PLLC, and files with this Court its Memorendum 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.

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION TO ALTER, AMEND AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT | Page 2

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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 Property 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.

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION TO ALTER, AMEND AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT | Page 3

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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 mortgage 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 mortgage 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.

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION TO ALTER, AMEND AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT | Page 4 E/1547.201/PLD/Post-Trian/VP Alter & Reconsider-Opposition Monto 169809.dog

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 IV and IV 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

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION TO ALTER, AMEND AND RECONSIDER

THE DECREE OF FORECLOSURE AND JUDGMENT | Page 5

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of Highway 200. It is uncontroverted that Parcel 121 is south of Highway 200. Therefore, once

Valiant disclaimed any interest in Parcel 121, IV'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 saic 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

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION TO ALTER, AMEND AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT | Page 6

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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 Forcelosure 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

VALIANT IDAHO, LLC'S MEMORANDUM IN OPPOSITION TO VP, INC.'S MOTION TO ALTER, AMEND AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT | Page 7

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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 10th day of August 2016.

McCONNELL WAGNER SYKES & STACEY PLLC

sliant Idaho, LLC

valiant idaho, llc's memorandum in opposition TO VP, INC.'S MOTION TO ALTER, AMEND AND RECONSIDER THE DECREE OF FORECLOSURE AND JUDGMENT | Page 8

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### 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 Counsel For J.V., LLC	U.S. Mail U.S. M
Susan P. Weeks, Esq. James, Vernon & Weeks, PA 1626 Lincoln Way Coeur d'Alene, Idaho 83814 Telephone: 208.667.0683 Facsimile: 208.664.1684 Counsel For VP Incorporated/North Idaho Resorts	[ ✓] U.S. Mail [ ] Hand Delivered [ ✓] Facsimile [ ] Overnight Mail [ ] Electronic Mail sweeks@ivwlaw.net

#### 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

Feight, Sykes

Richard L. Stacey, ISB #6800
Joff R. Sykes, ISB #5058
Chad M. Nicholson, ISB #7506
McCOnnell Wagner Sykes & Stacey Place
827 East Park Boulevard, Suite 201

Boise, Idaho 83712

Telephone: 208.489.0100 Facsimile: 208.489.0110 stacev@mwsslawyers.com

sykes@mwssiawyers.com nicholson@mwssiawyers.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.

¥3,

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

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

Honorable Barbara A. Buchanan

COMES NOW, Valiant Idaho, LLC ("Valiant"), by and through its attorneys of record, McConnell Wagner Sykes & Stacey PLLC, and, pursuant to LR.C.P 11 and LC. 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 10th day of August 2016.

MCCONNELL WAGNER SYKES & STACEY PLLC

BY:

Chad M. Nicholson

Attorneys For Valiant Idaho, LLC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th 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 Counsel For J.V., LLC	U.S. Mail Hand Delivered Facsimile Overnight Mail Electronic Mail Arytinney@finneylaw.net
Susan P. Weeks, Esq.  James, Vernon & Weeks, PA  1626 Lincoln Way  Coeur d'Alene, Idaho 83814  Telephone: 208.667.0683  Facsimile: 208.664.1684  Counsel For VP Incorporated/North Idaho Resorts	[ ✓] U.S. Mail [ ] Hand Delivered [ ✓] Facsimile [ ] Overnight Mail [ ✓] Electronic Mail sweeks@jvwlaw.net

# 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

Charles Market