

EXHIBIT A

Rai & Barone, P.C.
3033 North Central Avenue, Suite 500
Phoenix, AZ 85012
Tax ID No.: 20-1799878

June 29, 2021

Invoice submitted to:

National Claims Service
Alexis Grant

In Reference To: Case Name: Renco adv. K. Hovnanian
Project Name: The Gallery in Scottsdale
Claim Number: 46772
Date of Loss:
Cause Number: CV2020-008714
Attn: Alexis Grant

Invoice # 49474

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
3/16/2021	RR		
	Draft correspondence to carrier re: initial handling	0.20	39.00
	L120 Analysis/Strategy	195.00/hr	
	RR		
	Draft client letter requesting [REDACTED]	0.60	117.00
	L110 Fact Investigation/Development	195.00/hr	
	SRG		
	Draft and supplement client letter regarding representation and request for information .1.	0.10	19.50
	L110 Fact Investigation/Development	195.00/hr	
	SRG		
	Draft and supplement carrier letter regarding representation and request for information .1.	0.10	19.50
	L110 Fact Investigation/Development	195.00/hr	
3/17/2021	SRG		
	Initial review and analysis of claim file documents, pleadings, photos, project documents, and other information for initial case strategy development and further handling of defense. 1.4	1.40	273.00
	L210 Pleadings	195.00/hr	

			<u>Hrs/Rate</u>	<u>Amount</u>
3/18/2021	SRG	Drafted opposing counsel correspondence, notice of representation and request for information .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Teleconference to Dennis W office, opposing counsel requesting relevant case information, notices of claim, defect reports, complaints and other pleadings for further handling .4 L110 Fact Investigation/Development	0.40 195.00/hr	78.00
3/19/2021	SRG	Teleconference to Eric Lahti regarding representation, factual development, defense. L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Teleconference with corporate counsel regarding factual development and pleadings .2 L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Teleconference with expert MC Consultants regarding factual background and expert discovery and retention .2 L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG	Draft and supplement Initial Case Evaluation regarding overall project factual development, pleadings, civil complaint and case status, general defenses and recommendations for further handling. (11 pages) 2.6 L120 Analysis/Strategy	2.60 195.00/hr	507.00
3/29/2021	SRG	Teleconference to opposing counsel requesting information for further handling and response to complaint .2 L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Teleconference to corporate counsel seeking c [REDACTED] [REDACTED] L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Reviewed corporate counsel correspondence regarding [REDACTED] [REDACTED] L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Reviewed pleadings and service affidavit provided by corporate counsel for further handling of defense and response to third-party complaint .4	0.40 195.00/hr	78.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L210 Pleadings		
3/29/2021	SRG	Drafted Responses to Third-Party Complaint and Affirmative Defenses. (12 pages)	2.80 195.00/hr	546.00
		L210 Pleadings		
3/31/2021	SE	Drafted correspondence to coverage counsel Robert Cater for [REDACTED].	0.20 195.00/hr	39.00
		L210 Pleadings		
	SRG	Teleconference to corporate counsel Rick regarding [REDACTED].	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Drafted, revised and supplemented initial report based on information and pleadings provided by corporate counsel, Third-Party Complaint and Answer, Defendant's Motion for Summary Judgment and other developments. .8	0.80 195.00/hr	156.00
		L120 Analysis/Strategy		
	SRG	Draft and revise supplements and edits to Answer to Third-Party Complaint and Affirmative Defenses. .8	0.80 195.00/hr	156.00
		L210 Pleadings		
4/1/2021	SE	Telephone call to Rick Carter regarding [REDACTED].	0.60 180.00/hr	108.00
		L210 Pleadings		
4/2/2021	SE	Reviewed correspondence from Burg, Simpson, Eldredge, Hersh, and Jardine regarding disclosures made thus far in matter.	0.20 180.00/hr	36.00
		L110 Fact Investigation/Development		
	SRG	Teleconference to Eric Lahti regarding [REDACTED].	0.20 195.00/hr	39.00
		L210 Pleadings		
	SRG	Teleconference to corporate counsel regarding [REDACTED].	0.20 195.00/hr	39.00
		L210 Pleadings		
4/5/2021	SE	Reviewed and responded to correspondence with coverage counsel Rick Carter regarding [REDACTED].	0.20 180.00/hr	36.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L110 Fact Investigation/Development		
4/5/2021	SE	Reviewed correspondence from coverage counsel Rick Carter regarding [REDACTED]	0.20 180.00/hr	36.00
		L110 Fact Investigation/Development		
	SE	Reviewed and responded to correspondence with coverage counsel Rick Carter regarding Answer.	0.40 180.00/hr	72.00
		L110 Fact Investigation/Development		
	SE	Telephone call to Penny Manship regarding procedural history for the case thus far and relevant disclosures.	0.70 180.00/hr	126.00
		L110 Fact Investigation/Development		
4/15/2021	SRG	Drafted A.Grant correspondence regarding expert discovery and authority 1	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Reviewed A.Grant correspondence regarding expert discovery .1	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Teleconference with roofing expert regarding factual development, case history, factual background and claims. .4 With A.Grant authority on 4/15/21)	0.40 195.00/hr	78.00
		L340 Expert Discovery		
4/20/2021	SRG	Reviewed correspondence and court filing including Defendant/Third-Party Plaintiff Response to Rule 56 D Motion for impact on entire case and proceedings. With A.Grant authority on 4/15/21)	0.20 195.00/hr	39.00
		L210 Pleadings		
	SRG	Initial review of Plaintiff's Request for Rule 56 Relief for further handling of defense. With A.Grant authority on 4/15/21	0.30 195.00/hr	58.50
		L210 Pleadings		
	SRG	Reviewed and analyzed K.Hov. Motion for Summary Judgment on various Plaintiffs' claims for defense strategy.3 With A.Grant authority on 4/15/21	0.30 195.00/hr	58.50
		L240 Dispositive Motions		

			<u>Hrs/Rate</u>	<u>Amount</u>
4/20/2021	SRG	Reviewed and analyzed correspondence and court filing including Defendant/Third-Party Defendant Reply to Motion for Summary Judgment to determine impact on further handling of defense and strategy. (12) With A.Grant authority on 4/15/21	0.30 195.00/hr	58.50
		L240 Dispositive Motions		
	SRG	Reviewed and analyzed Khov. Motion to Dismiss all Plaintiffs' claims for further handling and analysis of defense strategy. .4 With A.Grant authority on 4/15/21	0.40 195.00/hr	78.00
		L240 Dispositive Motions		
	SRG	Reviewed Plaintiffs' Response to Motion for Summary Judgment and Controverting Statement of Facts. (22 pages) .4 With A.Grant authority on 4/15/21	0.40 195.00/hr	78.00
		L240 Dispositive Motions		
4/22/2021	SRG	Drafted all correspondence regarding Rule 56 pending Motion .1	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed minute entry and order regarding pending Rue 56 Motion .1	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed T.Wales correspondence on behalf of Chas Roberts regarding Plaintiffs' pending Rule 56 Motion and impact of future ruling .1	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed P.Manship correspondence on behalf of Plaintiff Gallery regarding Plaintiffs' pending Rule 56 Motion	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed A.Hough correspondence on behalf of Gothic Landscape regarding Plaintiffs' pending Rule 56 Motion and impact of future ruling .1	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed D.Wilenchek correspondence regarding Plaintiff's Rule 56 Motion .1	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Teleconference from opposing counsel regarding early Rule 16 mandatory meeting per ARCP 16 .2	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L230 Court Mandated Conferences		
4/23/2021	SRG	Reviewed T.Shorall correspondence regarding input to mandatory Rule 16 conference and joint litigation report to court .1	0.10 195.00/hr	19.50
		L230 Court Mandated Conferences		
	SRG	Reviewed S.Bert correspondence regarding input to mandatory Rule 16 conference and joint litigation report to court .1	0.10 195.00/hr	19.50
		L230 Court Mandated Conferences		
	SRG	Reviewed D.Shopick correspondence regarding input to mandatory Rule 16 conference and joint litigation report to court .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Teleconference from Jeff Harris regarding [REDACTED]	0.30 195.00/hr	58.50
		L130 Experts/Consultants		
4/26/2021	SRG	Reviewed counsel Penny correspondence regarding mandatory Rule 16 conference for participation .1	0.10 195.00/hr	19.50
		L230 Court Mandated Conferences		
4/27/2021	SRG	Reviewed Plaintiff's Rule 56 Motion, and Defendant's Response to Rule 56 Motion, in preparation for hearing .3	0.30 195.00/hr	58.50
		L210 Pleadings		
	SRG	Appear for oral argument on Plaintiff's pending Rule 56 Motion. .8	0.80 195.00/hr	156.00
		L210 Pleadings		
4/30/2021	SRG	Reviewed and analyzed Plaintiff correspondence and proposed Joint Report in preparation for appearing at mandatory Rule 16 conference with all counsel. .2	0.20 195.00/hr	39.00
		L250 Other Written Motions and Submissions		
	SRG	Teleconference to client regarding [REDACTED]	0.30 195.00/hr	58.50
		L110 Fact Investigation/Development		
	SRG	Reviewed and analyzed Plaintiff correspondence and proposed Order in preparation for appearing at mandatory Rule 16 conference with all counsel. .3	0.30 195.00/hr	58.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L250 Other Written Motions and Submissions		
4/30/2021	SRG	Teleconference to Plaintiff regarding expert discovery and disclosure for development and litigation..3	0.30 195.00/hr	58.50
		L310 Written Discovery		
5/1/2021	SE	Reviewed correspondence from Penny Manship regarding initial liability findings.	0.10 180.00/hr	18.00
		L210 Pleadings		
5/3/2021	SE	Reviewed and analyzed K. Hovnanian's Third-Party Complaint (16 pages), affidavit of process (2 pages), pictures of leak (2 pages), Allstar Claims Policy (65 pages), Allstar Dec (62 pages), Renco work agreement (7 pages) in preparation of drafting IDS.	0.90 180.00/hr	162.00
		L110 Fact Investigation/Development		
	SE	Drafted 26.1 IDS (20 pages) responding to all 8 asserted claims.	4.00 180.00/hr	720.00
		L210 Pleadings		
	SRG	Reviewed plaintiffs revisions to proposed joint report and order in preparation for mandatory joint meeting.2	0.20 195.00/hr	39.00
		L250 Other Written Motions and Submissions		
	SRG	Appear for mandatory Rule 16 joint meeting.	0.60 195.00/hr	117.00
		L230 Court Mandated Conferences		
5/4/2021	SE	Reviewed minute entry (3 pages) issued by Michael Kemp for impact on defense.	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		
	SE	Drafted and revised IDS (23 pages) adding all additional affirmative defenses available.	1.70 180.00/hr	306.00
		L210 Pleadings		
	SRG	Drafted plaintiff agreement to rule 16 as revised.1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Reviewed revised proposed Rule 16 order .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		

			<u>Hrs/Rate</u>	<u>Amount</u>
5/4/2021	SRG	Reviewed court minute entry regarding Rule 56 relief .1 L250 Other Written Motions and Submissions	0.10 195.00/hr	19.50
	SRG	Teleconference to plaintiff regarding further revisions and modifications to order .2 L250 Other Written Motions and Submissions	0.20 195.00/hr	39.00
	SRG	Reviewed plaintiffs correspondence regarding discussion of revisions to report and scheduling order. .2 L250 Other Written Motions and Submissions	0.20 195.00/hr	39.00
	SRG	Reviewed file in preparation for expert strategy conference for defense and further handling. L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG	Appear for defense expert conference for further handling of defense and overall strategy. L340 Expert Discovery	0.50 195.00/hr	97.50
5/5/2021	SE	Reviewed correspondence with job file (10 attachments) in preparation of drafting status update. L110 Fact Investigation/Development	0.10 180.00/hr	18.00
5/6/2021	SRG	Teleconference to Penny regarding investigation and expert evaluation of project and conditions .2 L110 Fact Investigation/Development	0.20 195.00/hr	39.00
5/11/2021	SRG	Drafted client;s Initial Rule 26.1 Disclosure Statement 1.7 L310 Written Discovery	1.70 195.00/hr	331.50
5/13/2021	SE	Reviewed correspondence from Penny Manship regarding Renco's procedural agreement received and entered for matter. L110 Fact Investigation/Development	0.10 180.00/hr	18.00
	SRG	Teleconference to Penny responsive to request for information .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed Plaintiff's counsel Penny correspondence and request for information .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
5/13/2021	SRG	Reviewed counsel B.Stansil correspondence and revisions to joint report and discovery. 1 L310 Written Discovery	0.10 195.00/hr	19.50
	SRG	Reviewed D. Schopick regarding general case proceedings and discovery .1 L310 Written Discovery	0.10 195.00/hr	19.50
	SRG	Teleconference with client regarding [REDACTED] [REDACTED] L310 Written Discovery	0.30 195.00/hr	58.50
5/18/2021	SRG	Drafted counsel response regarding defenses to express indemnity and contract language . L120 Analysis/Strategy	0.10 195.00/hr	19.50
	SRG	Reviewed corporate counsel correspondence regarding contractual express indemnity and defense. L210 Pleadings	0.20 195.00/hr	39.00
5/19/2021	SE	Reviewed and responded to correspondence from Rick Carter regarding [REDACTED] [REDACTED] L210 Pleadings	0.10 180.00/hr	18.00
	SE	Supplement and revise client/Es initial disclosure statement based on [REDACTED] [REDACTED] L210 Pleadings	0.30 180.00/hr	54.00
	SE	Reviewed new project documents (40 pages) and information received from corporate counsel in preparation for updating disclosure statement, legal theories of defense, and general case strategy. L120 Analysis/Strategy	1.00 180.00/hr	180.00
5/27/2021	SE	Reviewed scheduling order entered by the court (7 pages) in preparation of drafting status report. L210 Pleadings	0.10 180.00/hr	18.00
		For professional services rendered	<u>34.40</u>	<u>\$6,546.00</u>

Additional Charges :

	<u>Qty</u>	<u>Amount</u>
4/5/2021 TLO Court Filing Fee, Form Set # 5584036	1	259.05
4/6/2021 TLO Court Filing Fee, Form Set # 5584052	1	6.70
TLO Court Filing Fee, Form Set # 5587755	1	6.70
TLO Court Filing Fee, Form Set #5588080	1	6.70
Total costs		<u>\$279.15</u>
Total amount of this bill		<u>\$6,825.15</u>
Balance due		<u><u>\$6,825.15</u></u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Rina Rai - Partner	0.80	195.00	\$156.00
Shannon Huff- Partner	22.60	195.00	\$4,407.00
Samantha Egan	0.20	195.00	\$39.00
Samantha Egan	10.80	180.00	\$1,944.00

Total fees to date (inclusive of this bill) \$6,546.00

Total costs to date (inclusive of this bill) \$279.15

Rai & Barone, P.C.
3033 North Central Avenue, Suite 500
Phoenix, AZ 85012
Tax ID No.: 20-1799878

September 28, 2021

Invoice submitted to:

National Claims Service
Alexis Grant

In Reference To: Case Name: Renco adv. K. Hovnanian
Project Name: The Gallery in Scottsdale
Claim Number: 46772
Date of Loss:
Cause Number: CV2020-008714
Attn: Alexis Grant

Invoice # 50007

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2021	SRG	Drafted client response regarding initial rule 26.1 disclosure and verification .1	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed client's initial rule 26.1 disclosure statement.1	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed court order (7 pages) for impact on client's defense.	0.20 195.00/hr	39.00
		L310 Written Discovery		
	SRG	Teleconference with client regarding initial rule 26.1 disclosure statement contents .3	0.30 195.00/hr	58.50
		L310 Written Discovery		
6/4/2021	SRG	Teleconference to R.Carter regarding client's Initial Rule 26.1 Disclosure and contents and exhibits .1	0.10 195.00/hr	19.50
		L310 Written Discovery		

			<u>Hrs/Rate</u>	<u>Amount</u>
6/4/2021	SRG	Drafted Corporate Counsel correspondence regarding client's initial rule 26.1 and written discovery. L310 Written Discovery	0.10 195.00/hr	19.50
	SRG	Reviewed Gothic's Initial Rule 26.1 Disclosure Statement, factual defenses to claims and legal theories of defense for further handling of defense for client and strategy. (22+page) L310 Written Discovery	0.30 195.00/hr	58.50
	SRG	Reviewed and analyzed Defendant Chas Roberts correspondence, Initial Disclosure Statement and exhibits for understanding of factual assertions presented, legal theories of defense and other information for defense strategy. 70+ pages L310 Written Discovery	0.40 195.00/hr	78.00
6/7/2021	SRG	Reviewed correspondence and Liberty Constructors' Initial Disclosure Statement and exhibits for further handling of defense and joinder in legal theories. 40+pages L250 Other Written Motions and Submissions	0.20 195.00/hr	39.00
6/9/2021	SRG	Reviewed counsel correspondence for Liberty Constructors regarding discovery for case handling .1 L310 Written Discovery	0.10 195.00/hr	19.50
	SRG	Initial review and analysis of plaintiff's initial disclosure statement to assess basis for plaintiff's legal claims, fact witnesses, expert discovery and other material items for case handling. (appx 30 pages) L310 Written Discovery	0.60 195.00/hr	117.00
6/10/2021	SRG	Began drafting updated status report (2 pages). L110 Fact Investigation/Development	0.50 195.00/hr	97.50
6/11/2021	SRG	Drafted correspondence to Dennis Wilenchik regarding scope of exposure for claim against Renco Roofing. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed job file invoices with prices and outline of work performed in preparation of drafting status report and with carrier authority. (1 pages). L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Teleconference with client regarding general case proceedings, [REDACTED]	0.30 195.00/hr	58.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L340 Expert Discovery		
6/11/2021	SRG	Drafted response to tender (2 pages).	0.50 195.00/hr	97.50
		L120 Analysis/Strategy		
	SRG	Prepare defect summary for initial report.	1.10 195.00/hr	214.50
		L110 Fact Investigation/Development		
6/13/2021	SRG	Reviewed and analyzed vendor schedule (2 pages) with authority from carrier and in preparation of drafting status report.	0.40 195.00/hr	78.00
		L110 Fact Investigation/Development		
	SRG	Reviewed and analyzed master subcontract agreement (40 pages) with authority and in preparation of drafting status update.	0.60 195.00/hr	117.00
		L110 Fact Investigation/Development		
	SRG	Reviewed and analyzed community kick off meeting (4 pages) with carrier authority in preparation of drafting status update.	0.80 195.00/hr	156.00
		L110 Fact Investigation/Development		
	SRG	Reviewed and analyzed work agreement (7 pages) for roofing work performed with carrier authority in preparation of drafting status report.	0.90 195.00/hr	175.50
		L110 Fact Investigation/Development		
	SRG	Reviewed and analyzed work orders (30 pages) from client with carrier authority in preparation of drafting status report.	1.00 195.00/hr	195.00
		L110 Fact Investigation/Development		
	SRG	Reviewed and analyzed with carrier authority the Order Options (3 parts totaling 115 pages) in preparation of drafting status report to [REDACTED]	1.20 195.00/hr	234.00
		L110 Fact Investigation/Development		
6/14/2021	KM	Revised Response to Initial Notice of Claim to Dennis Wilenchik	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Revised and finalized tender response (1 page).	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Teleconference to K.Hov counsel requesting information in support of tender for defense/indemnity and other information .2	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L110 Fact Investigation/Development		
6/14/2021	SRG	Drafted status update (6 pages) based on [REDACTED]	2.10 195.00/hr	409.50
		L110 Fact Investigation/Development		
6/16/2021	SRG	Drafted all counsel regarding settlement negotiations and mediation .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed Plaintiff's counsel Penny correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed J.Boblick for Liberty Constructors correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed S.Best for LeBlanc Building correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed A.Hough for Gothic Landscaping correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed T.Wales for Chas Roberts correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed K.Hov counsel D.Wilenchik correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
6/17/2021	SRG	Reviewed and finalized status report (6 pages).	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Reviewed correspondence from Gallery's counsel regarding mediation.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed D.Schopick correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L160 Settlement/Non-Binding ADR		
6/17/2021	SRG	Teleconference to Plaintiff's counsel regarding expert discovery into allegations against client and mediation .3	0.30 195.00/hr	58.50
		L110 Fact Investigation/Development		
6/21/2021	SRG	Teleconference to adjuster regarding mediation and settlement demand .1	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Teleconference to counsel Penny for Plaintiffs regarding settlement demands and mediation .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Drafted adjuster regarding mediation and settlement demand .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed S.Best correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed adjuster correspondence regarding mediation and settlement.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed Chas Roberts correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed Plaintiff correspondence regarding settlement demand for mediation. 1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
6/24/2021	SRG	Teleconference with expert MC regarding Plaintiff's production of relevant project materials and engineering opinions. .3	0.30 195.00/hr	58.50
		L340 Expert Discovery		
7/7/2021	SRG	Initial review of LeBlank 26.1 disclosure and exhibits (total disclosure is 2300 pages+, this review included approximately 1200 pages) to determine scope of its roofing work on the project for defenses and expert discovery. Authority granted by Alexis Grant via email 4/15/2021.	2.10 195.00/hr	409.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L310 Written Discovery		
7/8/2021	SRG	Initial review of LeBlanc 26.1 disclosure and exhibits (total disclosure is 2300 pages+, this review included approximately 1100 pages) to determine scope of its roofing work on the project for defenses and expert discovery. Authority granted by Alexis Grant via email 4/15/2021.	1.40 195.00/hr	273.00
		L320 Document Production		
7/19/2021	SRG	Drafted counsel correspondence regarding court ordered mediation and settlement negotiations amongst all parties. .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed Penny Plaintiffs' counsel correspondence regarding court ordered mediation and settlement negotiations amongst all parties. .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed defense counsel L.Fink correspondence regarding court ordered mediation and settlement negotiations amongst all parties. .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed defense counsel P.Gentry correspondence regarding court ordered mediation and settlement negotiations amongst all parties. .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed defense counsel S.Zink correspondence regarding court ordered mediation and settlement negotiations amongst all parties. .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed defense counsel S.Best correspondence regarding mediation and settlement negotiations.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed defense counsel J.Boblick for Liberty correspondence regarding mediation and settlement negotiations.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed defense counsel A.Hough correspondence regarding mediation and settlement negotiations.	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L160 Settlement/Non-Binding ADR		
7/19/2021	SRG	Reviewed and analyzed defense counsel P.Manish correspondence regarding mediation and settlement negotiations.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed defense counsel T.Wales correspondence regarding mediation and settlement negotiations.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed defense counsel B.Stansil correspondence regarding mediation and settlement negotiations.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed correspondence from Penny Manship and subcontractors regarding overview of litigation and written discovery. (6x)	0.30 195.00/hr	58.50
		L310 Written Discovery		
7/20/2021	SRG	Drafted counsel response regarding agreement to stipulation and agreement to utilizing mediator Fleischman. .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed Penny correspondence requesting Stipulation on mediation and proposal for Mediator Fleischman 1.	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
7/21/2021	SRG	Reviewed and analyzed counsel J.Boblick correspondence regarding settlement negotiations and stipulation amongst parties. .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Reviewed and analyzed counsel T.Wales correspondence regarding settlement negotiations and stipulation amongst parties. .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Reviewed and analyzed counsel B.Stansil correspondence regarding settlement negotiations and stipulation amongst parties. .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Reviewed and analyzed counsel S.Best input regarding settlement negotiations and stipulation amongst parties. .1	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L250 Other Written Motions and Submissions		
7/21/2021	SRG	Reviewed and analyzed counsel A.Hough correspondence regarding settlement negotiations and stipulation amongst parties. .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Reviewed and analyzed correspondence and written discovery including Request for Production of Documents from Plaintiffs to Defendant/THird-Party Plaintiff K.Hov. Development to determine impact on client and defenses. (9 pages)	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed and analyzed correspondence and written discovery including Request for Production of Documents from Plaintiffs to Defendant/Third-Party Plaintiff K.Hov. Arizona Operations LLC to determine impact on client and defenses. (9 pages)	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed and analyzed correspondence and written discovery including Request for Production of Documents from Plaintiffs to Defendant/Third-Party Plaintiff K.Hov. Development of Arizona to determine impact on client and defenses. (9 pages)	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed and analyzed correspondence and written discovery including Request for Production of Documents from Plaintiffs to Defendant/Third-Party Plaintiff K.Hov. Gallery LLC to determine impact on client and defenses. (9 pages)	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed and analyzed correspondence and written discovery including Non Uniform Interrogatories from Plaintiffs to Defendant/THird-Party Plaintiff K.Hov. Companies of AZ. to determine impact on client and defenses. (8 pages)	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed and analyzed correspondence and written discovery including Non Uniform Interrogatories from Plaintiffs to Defendant/Third-Party Plaintiff K.Hov. Gallery. to determine impact on client and defenses. (10 pages)	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed and analyzed correspondence and written discovery including Non Uniform Interrogatories from Plaintiffs to Defendant/Third-Party Plaintiff K.Hov. Dev of AZ. to determine impact	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		on client and defenses. (8 pages)		
		L310 Written Discovery		
7/21/2021	SRG	Reviewed and analyzed correspondence and written discovery including Non Uniform Interrogatories from Plaintiffs to Defendant/THird-Party Plaintiff K.Hov. Companies AZ Operating to determine impact on client and defenses. (8 pages)	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Drafted and revised extensive correspondence to expert regarding Plaintiff and GC's expert opinions. (3x)	0.30 195.00/hr	58.50
		L130 Experts/Consultants		
	SRG	Reviewed plaintiffs' disclosure and scheduling order to outline revised defense strategy for expert discovery.	0.30 195.00/hr	58.50
		L310 Written Discovery		
	SRG	Reviewed written discovery 6.1 from Gallery (60 plus pages) to determine impact on defense.	0.50 195.00/hr	97.50
		L310 Written Discovery		
7/22/2021	KM	Prepare Claimant's Second Supplemental Disclosure Statement for review by expert Chad Polivka	0.20 195.00/hr	39.00
		L130 Experts/Consultants		
	SRG	Reviewed and analyzed counsel David Schopick regarding discovery and mediation .1	0.10 195.00/hr	19.50
		L310 Written Discovery		
7/25/2021	SRG	Reviewed and responded to client's corporate counsel regarding [REDACTED]	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
7/26/2021	SRG	Drafted adjuster correspondence regarding emergency roof leaks and repairs .1	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Teleconference to Rick corporate counsel [REDACTED]	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		

			<u>Hrs/Rate</u>	<u>Amount</u>
7/26/2021	SRG	Teleconference with corporate counsel regarding emergency roof leaks and repairs. .2 L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG	Reviewed opposing counsel correspondence regarding roof leaks due to rain and emergency roof leaks undergoing immediate repair for expert discovery. L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG	Reviewed emergency roof leak photos for further handling .2 L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG	Teleconference with Mario for K.Hov regarding scope of investigation of new roof leaks. L340 Expert Discovery	0.30 195.00/hr	58.50
	SRG	Teleconference to expert Chad and Jeff regarding general defense developments and production of additional information on new claims by Plaintiffs. .3 L340 Expert Discovery	0.30 195.00/hr	58.50
	SRG	Teleconference with expert regarding information related to emergency roof leaks and repairs. .5 (x2) L340 Expert Discovery	0.50 195.00/hr	97.50
	SRG	Teleconference with client Eric regarding emergency roof leaks and repairs. .6 (x2) L340 Expert Discovery	0.60 195.00/hr	117.00
7/27/2021	SRG	Drafted Penny correspondence regarding roof investigation and information related to roof leak investigation .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed Penny correspondence regarding more information related to roof leak investigation .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed adjuster correspondence regarding emergency roof repairs .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
7/27/2021	SRG	Review and analyzed correspondence regarding M.R. Tanner Development and Construction status as defendant to determine impact on client and defenses .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Reviewed and responded to written correspondence with Renco's Production Manager Adam Forstie. (2x)	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Reviewed and responded to correspondence with Renco President Eric Lahti regarding emergency repairs. (2x)	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Teleconference with Penny for Gallery regarding repairs, scope of repairs, and whether Gallery would accept repairs.	0.20 195.00/hr	39.00
		L130 Experts/Consultants		
	SRG	Client call regarding new facts regarding emergency roof leaks ..3	0.30 195.00/hr	58.50
		L110 Fact Investigation/Development		
	SRG	Teleconference with K.Hov counsel regarding information related to roof leaks and investigation .3	0.30 195.00/hr	58.50
		L110 Fact Investigation/Development		
	SRG	Reviewed claim file in preparation of attending inspection of emergency repair and witness repairs.	0.30 195.00/hr	58.50
		L130 Experts/Consultants		
	SRG	Telephone call with client regarding emergency repairs and impact on litigation.	0.50 195.00/hr	97.50
		L110 Fact Investigation/Development		
	SRG	Teleconference with Mario for K.Hov regarding repairs, scope of repairs, and whether the prior testing at the project impacted the site at issue for emergency repair.	0.60 195.00/hr	117.00
		L110 Fact Investigation/Development		
	SRG	Reviewed photos and notes taken at emergency repairs on July 27, 2021.; Attended onsite emergency repair and inspections on roof of project with Alexis Grant authority.	0.80 195.00/hr	156.00
		L110 Fact Investigation/Development		

			<u>Hrs/Rate</u>	<u>Amount</u>
7/27/2021	SRG	Initial review and analysis of Gallery initial disclosure and disclosed documents, including (Gallery 1-Gallery 500) for analysis of roof specifications, details, notice of repairs for possible MSJ on negligence claims, and other information for overall defense strategy. (500 pages)	1.60 195.00/hr	312.00
		L320 Document Production		
	SRG	Drafted impact report (15 pages) to carrier regarding emergency repairs made at Gallery.	2.80 195.00/hr	546.00
		L110 Fact Investigation/Development		
	SRG	Appear for emergency roof inspection and repairs with Alexis Grant authority (4.2)	4.20 195.00/hr	819.00
		L340 Expert Discovery		
7/28/2021	SRG	Directed expert discovery and disclosure coordination in advance of expert report deadline.	0.10 195.00/hr	19.50
		L130 Experts/Consultants		
	SRG	Initial review and analysis of Gallery initial disclosure and disclosed documents, including (Gallery 501-Gallery 800) for analysis of roof specifications, details, notice of repairs for possible MSJ on negligence claims, and other information for overall defense strategy. (300 pages)	0.80 195.00/hr	156.00
		L320 Document Production		
	SRG	Revise and supplement impact report elaborating on [REDACTED]	1.10 195.00/hr	214.50
		L120 Analysis/Strategy		
7/29/2021	KM	Prepare Claimant's Third Supplemental Disclosure Statement for review by expert Chad Polivka	0.20 195.00/hr	39.00
		L130 Experts/Consultants		
	SRG	Drafted adjuster response to request for information .1	0.10 195.00/hr	19.50
		L120 Analysis/Strategy		
	SRG	Reviewed A. Grant correspondence regarding expert authority and request for information .1	0.10 195.00/hr	19.50
		L340 Expert Discovery		

			<u>Hrs/Rate</u>	<u>Amount</u>
7/29/2021	SRG	Drafted correspondence to Penny Manship regarding disclosures for individual unit owners. L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Reviewed file in preparation in response to A.Grant response to request for information. L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Initial review and analysis of Gallery initial disclosure and disclosed documents, including (Gallery 801-Gallery 1165) for analysis of roof specifications, details, notice of repairs for possible MSJ on negligence claims, and other information for overall defense strategy. (300 pages) L320 Document Production	0.80 195.00/hr	156.00
7/30/2021	SRG	Telephone call to client for [REDACTED] [REDACTED] L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Drafted correspondence to K. Hov's counsel in response to emergency repairs. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Supplement Renco correspondence to Gallery regarding requested information related to roof history, maintenance, and repairs .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Drafted all counsel correspondence regarding mediation and settlement negotiation details for further handling and resolution.1 L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed correspondence from P.Manship regarding mediation and settlement negotiation details for further handling and resolution.1 L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed correspondence from J.Boblick regarding mediation and settlement negotiation details for further handling and resolution.1 L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed correspondence from T.Wales for Chas Roberts regarding mediation and settlement negotiation details for further handling and resolution.1	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L160 Settlement/Non-Binding ADR		
7/30/2021	SRG	Reviewed and analyzed correspondence from A.Hough for Gothic regarding mediation and settlement negotiation details for further handling and resolution.1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed correspondence and filing of Notice of Representation of Integrated Lath & Plaster	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Telephone call to K.Hov counsel in preparation of issuing written discovery.	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Drafted information request to the Gallery. (1 page)	0.30 195.00/hr	58.50
		L310 Written Discovery		
	SRG	Telephone call with Penny Manship of MC Consulting regarding disclosures for unit owners or need for written discovery to be served.	0.30 195.00/hr	58.50
		L310 Written Discovery		
	SRG	Telephone call with K. Hov firm regarding subpoena for individual unit owners.	0.50 195.00/hr	97.50
		L320 Document Production		
8/3/2021	SRG	Reviewed Penny Gallery counsel correspondence regarding discovery and subpoena for records to the COAÆs property management company to determine whether scope covers roofs..	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Drafted Penny for Gallery correspondence response mediation and third-party defendants production of expert reports and opinions.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Reviewed penny for Gallery correspondence regarding mediation and third-party defendants production of expert reports and opinions (x2)	0.20 195.00/hr	39.00
		L340 Expert Discovery		

			<u>Hrs/Rate</u>	<u>Amount</u>
8/3/2021	SRG	Teleconference to Chad P. Regarding emergency repairs. .5 L340 Expert Discovery	0.50 195.00/hr	97.50
8/4/2021	SRG	Reviewed and analyzed Defense counsel T.Wales for Chas Roberts correspondence regarding expert discovery and settlement negotiations .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed Defense counsel A.Hough for Gothic correspondence regarding expert discovery and settlement negotiations .1 L310 Written Discovery	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed Plaintiff's counsel P.Manship correspondence regarding expert discovery and settlement negotiations .1 L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG	Teleconference with Mario for K.Hov regarding defense liability reports and disclosures .4 L340 Expert Discovery	0.40 195.00/hr	78.00
8/5/2021	SRG	Drafted adjuster correspondence regarding emergency roof repair and request for authority .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed correspondence regarding mediation and settlement negotiations .2 L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	SRG	Reviewed and analyzed Larry Fleischman correspondence regarding mediation, commencing settlement negotiations immediately and demands, an general strategy for mediation given number of parties. (X2) .2 L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	SRG	Teleconference with expert regarding emergency roof leak and temporary repair. .2 L340 Expert Discovery	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
8/5/2021	SRG	Teleconference with client regarding emergency roof repair	0.30	58.50
		L110 Fact Investigation/Development	195.00/hr	
	SRG	Teleconference from Penny Gallery's counsel regarding new emergency roof leaks.	0.30	58.50
		L110 Fact Investigation/Development	195.00/hr	
8/9/2021	SRG	Drafted client correspondence regarding notice of additional water intrusion .1	0.10	19.50
		L110 Fact Investigation/Development	195.00/hr	
	SRG	Drafted expert correspondence regarding failure of roof repair, new damages, and further investigation of area/repair that failed. .1	0.10	19.50
		L340 Expert Discovery	195.00/hr	
	SRG	Reviewed and analyzed Stipulation and Proposed order to amend expert discovery and mediation .1	0.10	19.50
		L340 Expert Discovery	195.00/hr	
	SRG	Teleconference from client regarding notice of additional water intrusion .2	0.20	39.00
		L150 Budgeting	195.00/hr	
	SRG	Teleconference from Penny Manship regarding discovery of temporary roof repair failure and notice of further inspections. .3	0.30	58.50
		L110 Fact Investigation/Development	195.00/hr	
	SRG	Drafted adjuster correspondence regarding [REDACTED]	0.30	58.50
		[REDACTED]	195.00/hr	
		L130 Experts/Consultants		
	SRG	Reviewed disclosures from the Gallery Bates 942-980 with authority.	0.70	136.50
		L310 Written Discovery	195.00/hr	
	SRG	Revise and supplement liability analysis, defect breakdown and potential exposure after review of Plaintiff's expert report, cost of repair, and other documents related to recent water intrusion events. .8 (14 page)	0.80	156.00
		L340 Expert Discovery	195.00/hr	

			<u>Hrs/Rate</u>	<u>Amount</u>
8/10/2021	MJ	Review, analyze and summarize all disclosed documents in the matter for attorney review to streamline discovery. L110 Fact Investigation/Development	2.70 195.00/hr	526.50
	SRG	Reviewed and analyzed expert correspondence regarding emergency roof repairs. .1 L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG	Teleconference with client regarding additional emergency repairs and inspection of water intrusion areas. .2 L110 Fact Investigation/Development	0.20 195.00/hr	39.00
8/11/2021	SRG	Drafted adjuster correspondence [REDACTED] L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed adjuster correspondence regarding liability analysis. .1 L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed and responded to correspondence with expert consultant regarding emergency repairs. (3x) L130 Experts/Consultants	0.20 195.00/hr	39.00
8/12/2021	SRG	Teleconference from Penny for Plaintiff regarding emergency repair and observations. L110 Fact Investigation/Development	0.30 195.00/hr	58.50
	SRG	Drafted status update to carrier with impact analysis of [REDACTED] L340 Expert Discovery	2.40 195.00/hr	468.00
8/13/2021	SRG	Drafted K.Hov correspondence regarding emergency repair and request for information. L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG	Teleconference with Homeowners' counsel Penny regarding notice of actual repairs being performed to the temporary repairs performed at unit 3106. L110 Fact Investigation/Development	0.30 195.00/hr	58.50

			<u>Hrs/Rate</u>	<u>Amount</u>
8/13/2021	SRG	Meeting with client regarding [REDACTED]. L110 Fact Investigation/Development	0.50 195.00/hr	97.50
	SRG	Appear for meeting with expert and client regarding [REDACTED]. L340 Expert Discovery	0.50 195.00/hr	97.50
	SRG	Teleconference to K.Hov regarding emergency repairs and request for information related to failed repair. (x2) L340 Expert Discovery	0.60 195.00/hr	117.00
	SRG	Reviewed and analyzed Plaintiff's expert Construction and Design Compliance Report (208 pages) for relevant impact on defense of roofing, walk deck, and SPF spray scopes of work to include analysis in carrier update. L340 Expert Discovery	1.10 195.00/hr	214.50
	SRG	Reviewed and analyzed Plaintiff's expert cost of repair report (13 pages) in preparation of including relevant roofing and walk deck scopes of work in carrier update regarding impact of allegations L340 Expert Discovery	1.40 195.00/hr	273.00
	SRG	Appear for site inspections and emergency roof and deck repairs with client representative (Aaron) and expert (Danny) with authority from adjuster on August 11 via email. L130 Experts/Consultants	3.30 195.00/hr	643.50
8/14/2021	SRG	Reviewed Penny correspondence regarding notice of emergency roof leak at 3106. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Teleconference with client regarding notice of another roof leak at 3106. L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Teleconference from K.Hov counsel Barbara regarding notice of emergency roof leak and repair at 3106. (x2) L110 Fact Investigation/Development	0.50 195.00/hr	97.50
8/16/2021	SRG	Reviewed Penny correspondence regarding request for Renco to perform repairs. .1	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L110 Fact Investigation/Development		
8/16/2021	SRG	Reviewed and analyzed Penny Manship correspondence regarding additional detail related to emergency repair performed at unit 3106 over the weekend to determine impact on client .1	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Reviewed and analyzed Third Party Defendant Liberty Constructors, LLC/Æs Notice of Non-Party at Fault.	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Drafted correspondence to K.Hov counsel regarding production of liability expert reports.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Teleconference to Penny for Plaintiff requesting information related to emergency roof repair at project on Saturday, August 14, notice of prior offer to make repairs. .2	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Teleconference with K.Hov's Barbara regarding expert discovery and reports responsive to plaintiffs.	0.30 195.00/hr	58.50
		L340 Expert Discovery		
	SRG	Draft Penny correspondence regarding response to repair request and details related to prior offer to make repairs to move matter towards resolution .4	0.40 195.00/hr	78.00
		L110 Fact Investigation/Development		
	SRG	Drafted Notice of Non Parties at Fault. [REDACTED]	0.70 195.00/hr	136.50
		L210 Pleadings		
8/17/2021	SRG	Reviewed and analyzed Court order regarding mediation and Third-Party Defendants expert discovery .1	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Drafted experts Jeff and Chad correspondence regarding expert discovery and production of expert reports. .	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L340 Expert Discovery		
8/17/2021	SRG	Drafted experts correspondence regarding K.Hov's production of expert reports and opinions. .1	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Meeting with expert regarding [REDACTED]	1.00 195.00/hr	195.00
		L340 Expert Discovery		
	SRG	Draft updated impact report regarding [REDACTED]	2.10 195.00/hr	409.50
		L120 Analysis/Strategy		
8/18/2021	SRG	Reviewed and analyzed A.Grant regarding [REDACTED]	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Teleconference with K.Hov counsel regarding repairs, ongoing discovery of new damages, offer to make repairs and other information.	0.60 195.00/hr	117.00
		L110 Fact Investigation/Development		
	SRG	Teleconference with Penny regarding potential repairs and settlement negotiations.	0.80 195.00/hr	156.00
		L160 Settlement/Non-Binding ADR		
8/20/2021	SRG	Drafted Penny correspondence regarding destructive testing at 3106.	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Reviewed K.Hov joinder to Renco Notice of Non Party at fault for joinder .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Drafted supplemental Notice of Non Party at Fault identifying roofer that performed ineffective repair at 3106 roof deck.	0.20 195.00/hr	39.00
		L250 Other Written Motions and Submissions		
	SRG	Teleconference with expert regarding emergency repairs, internal unit damage, and water testing for defense strategy.	0.50 195.00/hr	97.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L340 Expert Discovery		
8/22/2021	SRG	Draft expert correspondence regarding notice of emergency inspections and observations of (2) additional units.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Draft expert correspondence regarding (2) new roof leaks at other units.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	SRG	Reviewed and analyzed various correspondence from Plaintiff's counsel regarding notice of (2) new roof leaks.	0.30 195.00/hr	58.50
		L340 Expert Discovery		
8/23/2021	SRG	Reviewed and analyzed K.Hov correspondence regarding information for defense and claims and further handling .1	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Review correspondence and Subpoena to Property Management Co	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Reviewed expert correspondence regarding [REDACTED]	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Reviewed and analyzed adjuster regarding [REDACTED]	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Teleconference from Expert MC Consultant regarding [REDACTED]	0.30 195.00/hr	58.50
		L340 Expert Discovery		
8/26/2021	MT	Review and analyzed claim file (complaint, disclosure documents, and repairs) in preparation of drafting supplemental disclosure re: identity of repair companies, notice pursuant to PDA statute and analysis. Approved by adjuster.	1.50 180.00/hr	270.00
		L120 Analysis/Strategy		
	SRG	Reviewed and analyzed K.Hov correspondence regarding Plaintiff's accidental production of privileged documents. .1	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L310 Written Discovery		
8/26/2021	SRG	Drafted plaintiff correspondence regarding privileged documents and destruction of same. .1	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Teleconference to expert regarding privileged documents disclosed by plaintiff and instruction to destroy .1	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Reviewed and analyzed Plaintiff correspondence regarding accidental disclosure of voluminous privileged documents and instructions to destroy documents. .2	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
8/27/2021	MT	Review and analyzed purchase dwelling action statutes and relevant claim file regarding notice requirement to subcontractor in preparation of establishing defense under PDA statute	0.80 180.00/hr	144.00
		L120 Analysis/Strategy		
	MT	Review and analyzed relevant factual documents and pleadings and notice of claim letter to determine date of defects, date of notice, and who notice was sent to in preparation of determining legal defense for failure to provide notice under PDA statute.	1.00 180.00/hr	180.00
		L120 Analysis/Strategy		
8/30/2021	MT	Review and analyzed correspondence re: emergency inspection for one of the properties, objection to inspection, and warranty analysis.	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Prepared for emergency inspection taking place tomorrow by reviewing relevant files re: unit number for inspection to know damages and repairs.	0.40 180.00/hr	72.00
		L120 Analysis/Strategy		
	KM	Draft Notice of Substitution of Counsel	0.20 195.00/hr	39.00
		L210 Pleadings		
	SRG	Drafted adjuster correspondence regarding notice of new water intrusion and request for authority .1	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		

			<u>Hrs/Rate</u>	<u>Amount</u>
8/30/2021	SRG	Reviewed adjuster correspondence [REDACTED] [REDACTED]	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Reviewed counsel G.Oserg correspondence regarding emergency roof leak/water intrusion. .1	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Drafted all counsel objection to inspection and notice of waived warranty.	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed Barbara S correspondence regarding another new leak and emergency repair at unit 3112 N. 71st Street	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Teleconference with client regarding [REDACTED] [REDACTED]	0.30 195.00/hr	58.50
		L110 Fact Investigation/Development		
	SRG	Teleconference to Plaintiff's counsel P.Manship inquiring into building, area and additional information related to new water intrusion area.	0.40 195.00/hr	78.00
		L110 Fact Investigation/Development		
8/31/2021	MT	Teleconference with client to discuss [REDACTED] [REDACTED]	0.40 180.00/hr	72.00
		L120 Analysis/Strategy		
	MT	[TRAVEL TIME] travel time to and from emergency inspection at Gallery condo unit 3112 negotiations. 71st street in Scottsdale, AZ. (roundtrip).	0.80 180.00/hr	144.00
		L110 Fact Investigation/Development		
	MT	Drafted impact report to carrier to include information and analysis for [REDACTED].	1.50 180.00/hr	270.00
		L120 Analysis/Strategy		
	MT	Attended emergency inspection and repair of Gallery unit 3112 negotiations. 71st street, scottsdale, AZ leak as requested by plaintiff.	2.00 180.00/hr	360.00
		L110 Fact Investigation/Development		

	<u>Hrs/Rate</u>	<u>Amount</u>
8/31/2021 SRG Reviewed adjuster correspondence regarding a [REDACTED] [REDACTED] L120 Analysis/Strategy	0.10 195.00/hr	19.50
For professional services rendered	<u>83.70</u>	<u>\$16,192.50</u>

Additional Charges :

	<u>Qty</u>	
8/17/2021 TLO Court Filing Fee, Form Set # 6002619	1	6.70
8/20/2021 TLO Court Filing Fee, Form Set # 6013623	1	6.70
8/30/2021 KM Court Filing Fee, Form Set # 6043044	1	6.70
Total costs		<u>\$20.10</u>

Total amount of this bill

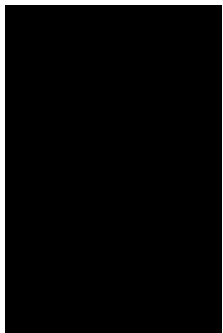
\$16,212.60

Previous balance

8/16/2021 Payment received from NCS - thank you. Check No. 42395
9/13/2021 Write off for invoice no. 49474

Total payments and adjustments

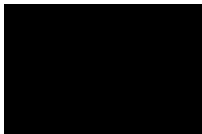
Balance due



Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Shannon Huff- Partner	71.60	195.00	\$13,962.00
Mohamad Tokko	8.60	180.00	\$1,548.00
Kristin Matysek	0.80	195.00	\$156.00
Misty James - Paralegal	2.70	195.00	\$526.50

Total fees to date (inclusive of this bill)



Total costs to date (inclusive of this bill)

Rai & Barone, P.C.

3033 North Central
Avenue, Suite 500
Phoenix, AZ 85012
Tax ID No.: 20-1799878

December 28, 2021

Invoice submitted to:

National Claims Service
Alexis Grant

In Reference To: Case Name: Renco adv. K. Hovnarian
Project Name: The Gallery in Scottsdale
Claim Number: 46772
Date of Loss:
Cause Number: CV2020-008714
Attn: Alexis Grant

Invoice # 50590

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>	
9/7/2021	MT	Review and analyzed plaintiff and K-Hov stipulation to extend amended response to MSJ deadline and proposed order filed with the court today.	0.30 180.00/hr	54.00
		L250 Other Written Motions and Submissions		
	SRG	Reviewed H.Davies correspondence regarding notice of association and representation of K.Hov. .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
9/9/2021	TLO	Draft correspondence to MC Consultants regarding review of case disclosure statements	0.20 95.00/hr	19.00
		L130 Experts/Consultants		
	TLO	Prepare all disclosure statements and exhibits for review by expert, MC Consultants	0.50 95.00/hr	47.50
		L130 Experts/Consultants		
	MT	Teleconference with client to discuss [REDACTED]	0.70 180.00/hr	126.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L120 Analysis/Strategy		
9/9/2021	SRG	Reviewed and analyzed plaintiffs disclose of new homeowner documents and photos related to alleged roof and deck damages.	0.30 195.00/hr	58.50
		L340 Expert Discovery		
	SRG	Strategize and draft discovery and defense plan for further handling of liability analysis and minimizing exposure.	0.70 195.00/hr	136.50
		L150 Budgeting		
	SRG	Reviewed K.Hov disclosures and investigation support disclosed on behalf of Bert Howe to determine impact on client and defenses. 30+	0.80 195.00/hr	156.00
		L340 Expert Discovery		
	SRG	Reviewed and analyzed K.Hov disclosure related to expert investigation performed by Peterson Geotechnical Group to see if opinions have any impact on claims implicating client.50+ pages	1.20 195.00/hr	234.00
		L340 Expert Discovery		
9/10/2021	MT	Review and analyzed 6th supplemental disclosure from plaintiff re: photos and info on damages in two units and repairs.	0.40 180.00/hr	72.00
		L310 Written Discovery		
9/13/2021	SRG	Client call regarding continued [REDACTED]	0.40 195.00/hr	78.00
		L340 Expert Discovery		
9/14/2021	MT	Teleconference with experts to discuss strategy and prepare for findings of liability.	0.30 180.00/hr	54.00
		L130 Experts/Consultants		
	MT	Drafted status report re: [REDACTED]	0.50 180.00/hr	90.00
		L120 Analysis/Strategy		
	MT	Review and analyzed pleadings, repairs done on units, expert opinions, and disclosures in preparation of drafting status report to carrier.	0.80 180.00/hr	144.00
		L120 Analysis/Strategy		
	MT	Review and analyzed plaintiff's expert findings and cost of repair, k hov's expert findings and cost of repair (~130+ pages) in preparation of teleconference with our experts.	1.20 180.00/hr	216.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L130 Experts/Consultants		
9/14/2021	MT Teleconference with experts Jeff and Chad to discuss and go over plaintiff's expert reports and k. Hov expert reports in preparation of providing status update on liability to carrier.	1.80 180.00/hr	324.00
	L130 Experts/Consultants		
9/15/2021	MT Teleconference with our expert to finish discussing k hov expert findings and both gallery and k hov's cost of repair estimates in preparation of drafting status report and formulating legal defenses.	0.60 180.00/hr	108.00
	L130 Experts/Consultants		
	MT Drafted status report to include discussion and findings of our expert after review of parties' experts' findings re: [REDACTED]	2.50 180.00/hr	450.00
	L130 Experts/Consultants		
9/20/2021	MT Review and analyzed plaintiff Gallery INITIAL disclosure statements and relevant attachments (~1000+ pages) to identify units and companies that conducted repairs to determine additional nonparties at fault and provide relevant documents for our expert review. Although voluminous, used disclosure statement descriptions of exhibits to conducted detailed review of only relevant documents.	1.80 180.00/hr	324.00
	L120 Analysis/Strategy		
	SRG Revise and supplement liability analysis based on Plaintiff and K.Hov's expert opinions, claims, explanation of claims, and defenses. 14 pages	1.40 195.00/hr	273.00
	L120 Analysis/Strategy		
9/21/2021	MT Review and analyzed plaintiff Gallery FOURTH, FIFTH, & SIXTH supplemental disclosure statements and relevant attachments (~70+ pages) to identify units and companies that conducted repairs to determine additional nonparties at fault and provide relevant documents for our expert review.	0.80 180.00/hr	144.00
	L120 Analysis/Strategy		
	MT Drafted status report and made final revisions to provide more detail and analysis in the [REDACTED]	1.00 180.00/hr	180.00
	L120 Analysis/Strategy		
	MT Review and analyzed plaintiff Gallery FIRST supplemental disclosure statement and relevant attachments (~5000+ pages) to identify units and companies that conducted repairs to determine additional	1.70 180.00/hr	306.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	nonparties at fault and provide relevant documents for our expert review. Although voluminous, used disclosure statement descriptions of exhibits to conducted detailed review of only relevant documents.		
	L120 Analysis/Strategy		
9/21/2021	MT Review and analyzed plaintiff Gallery THIRD supplemental disclosure statement and relevant attachments (~6000+ pages) to identify units and companies that conducted repairs to determine additional nonparties at fault and provide relevant documents for our expert review. Although voluminous, used disclosure statement descriptions of exhibits to conducted detailed review of only relevant documents.	2.00 180.00/hr	360.00
	L120 Analysis/Strategy		
	MT Review and analyzed plaintiff Gallery SECOND supplemental disclosure statement and relevant attachments (~6000+ pages) to identify units and companies that conducted repairs to determine additional nonparties at fault and provide relevant documents for our expert review. Although voluminous, used disclosure statement descriptions of exhibits to conducted detailed review of only relevant documents.	2.20 180.00/hr	396.00
	L120 Analysis/Strategy		
	SRG Reviewed and analyzed correspondence and Defendant/K.Hov Companies of Arizona Response to Plaintiff's First set of Non Uniform Interrogatories for factual and defense strategy development (6 pages)	0.20 195.00/hr	39.00
	L310 Written Discovery		
	SRG Reviewed and analyzed correspondence and Defendant/K.Hov Companies of Arizona Response to Plaintiff's First set of Requests for Production for factual and defense strategy development (7 pages)	0.20 195.00/hr	39.00
	L310 Written Discovery		
9/22/2021	MT Review and analyzed plaintiff KHOV initial and first supplemental disclosure statements and relevant attachments (~1700+ pages) to identify units and companies that conducted repairs to determine additional nonparties at fault and provide relevant documents for our expert review. Although voluminous, used disclosure statement descriptions of exhibits to conducted detailed review of only relevant documents.	1.20 180.00/hr	216.00
	L120 Analysis/Strategy		
9/23/2021	MT Review and analyzed notice of errata in answer of K Hov.	0.10 180.00/hr	18.00
	L250 Other Written Motions and Submissions		

		<u>Hrs/Rate</u>	<u>Amount</u>
9/23/2021	MT	Review and analyzed three Defendants K Hov AZ Ops, K Hov Development, and K Hov Gallery's responses to plaintiff's written discovery, specifically each defendant's responses to RFPs and NUIs (~60 pgs, plus 200 pgs of insurance policy disclosed) in preparation of defense and discovery strategy. L310 Written Discovery	1.60 180.00/hr 288.00
	SRG	Teleconference to defense counsel regarding prior disclosure and notice. . L210 Pleadings	0.10 195.00/hr 19.50
10/1/2021	MT	Review and analyzed and drafted by making revisions to written discovery (NUIs, RFAs, RFPs), to be served on K Hov re: repairs and scope of work. L310 Written Discovery	0.40 180.00/hr 72.00
	SRG	Communicate with expert regarding [REDACTED] [REDACTED] L340 Expert Discovery	0.80 195.00/hr 156.00
	MJ	Begin draft of non-uniform interrogatories to K Hovnanian. L310 Written Discovery	0.40 95.00/hr 38.00
	MJ	Begin draft request for production of documents to K Hovnanian. L310 Written Discovery	0.40 95.00/hr 38.00
	MJ	Begin draft of requests for admission to K Hovnanian. L310 Written Discovery	0.40 95.00/hr 38.00
10/4/2021	MT	Review and analyzed Plaintiff and Defendant's Stipulation for Second Extension for Plaintiff's Amended Response to Defendant's MSJ and proposed order. L250 Other Written Motions and Submissions	0.20 180.00/hr 36.00
	MT	Review and analyzed Plaintiff's 7th supplemental disclosure statement and attachments (~50 pgs), to prepare next steps in written discovery and legal strategy with repairs. L310 Written Discovery	0.40 180.00/hr 72.00
	MT	Drafted written discovery to Defendant K Hov, specifically added additional questions in non uniform interrogatories (NUIs) (10 total pgs), in preparation of serving K Hov, to give responses to expert.	0.70 180.00/hr 126.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L310 Written Discovery		
10/4/2021	MT Drafted written discovery to Defendant K Hov, specifically added additional requests in request for admissions (RFAs) (8 total pgs), in preparation of serving K Hov, to give responses to expert.	0.70 180.00/hr	126.00
	L310 Written Discovery		
	MT Drafted written discovery to Defendant K Hov, specifically added additional requests in request for production of documents (RFPs) (10 total pgs), in preparation of serving K Hov, to give responses to expert.	0.80 180.00/hr	144.00
	L320 Document Production		
	SRG Teleconference to K.Hov counsel requesting clarification of the (4) different K.Hov entities involved, and details related to repairs performed to client's work.	0.30 195.00/hr	58.50
	L110 Fact Investigation/Development		
	SRG Teleconference with client regarding discussion of [REDACTED]	0.60 195.00/hr	117.00
	L110 Fact Investigation/Development		
10/5/2021	MT Review and analyzed and drafted correspondence to/from expert re: relevant documents in preparation of expert opinions.	0.10 180.00/hr	18.00
	L130 Experts/Consultants		
	MT Drafted written discovery to Plaintiff GALLERY, specifically request for production of documents (RFPs) (10 total pgs), in preparation of serving Gallery, to give responses to expert.	1.10 180.00/hr	198.00
	L320 Document Production		
	MT Drafted written discovery to Plaintiff GALLERY, specifically request for admissions (RFAs) (8 total pgs), in preparation of serving Gallery, to give responses to expert.	1.20 180.00/hr	216.00
	L310 Written Discovery		
	MT Drafted written discovery to Plaintiff GALLERY, specifically non uniform interrogatories (NUIs) (10 total pgs), in preparation of serving Gallery, to give responses to expert.	1.40 180.00/hr	252.00
	L310 Written Discovery		
10/6/2021	SRG Teleconference to client regarding continued [REDACTED].	0.40 195.00/hr	78.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L120 Analysis/Strategy		
10/8/2021	MT Review and analyzed four (4) notices of deposition of each of the four K. Hov defendant entities.	0.30 180.00/hr	54.00
	L330 Depositions		
10/11/2021	MJ Prepare correspondence to P. Mackey re: document review in preparation of upcoming expert report.	0.10 95.00/hr	9.50
	L110 Fact Investigation/Development		
	MJ Review and analyze file to determine documents for expert review in preparation of upcoming expert report.	3.70 95.00/hr	351.50
	L130 Experts/Consultants		
10/12/2021	MJ Receive and review correspondence from P. Mackey re: review of records in preparation of expert report.	0.10 95.00/hr	9.50
	L130 Experts/Consultants		
10/13/2021	MT Drafted correspondence to client re: upcoming mediation.	0.10 180.00/hr	18.00
	L160 Settlement/Non-Binding ADR		
	MT Teleconference with Gallery (plaintiff) counsel regarding status of case, settlement demands, and upcoming mediation in preparation of settlement negotiations and potential resolution.	0.30 180.00/hr	54.00
	L160 Settlement/Non-Binding ADR		
	MT Drafted updated status report re: [REDACTED]	0.40 180.00/hr	72.00
	L120 Analysis/Strategy		
	SRG Teleconference with client regarding [REDACTED]	0.20 195.00/hr	39.00
	L160 Settlement/Non-Binding ADR		
	SRG Teleconference with K.Hov regarding mediation and case proceedings .2	0.20 195.00/hr	39.00
	L160 Settlement/Non-Binding ADR		

			<u>Hrs/Rate</u>	<u>Amount</u>
10/15/2021	TLO	Draft Conflict of Interest Waiver	0.20	19.00
		L140 Document/File Management	95.00/hr	
	MT	Teleconference with client and client's corporate counsel to discuss [REDACTED].	0.20	36.00
		L120 Analysis/Strategy	180.00/hr	
	MT	Review and analyzed plaintiff's 8th supplemental disclosure and attachments (~250 pgs) in preparation of determining documents for expert and any relevant information in defense of client.	2.40	432.00
		L310 Written Discovery	180.00/hr	
10/19/2021	MT	Review and analyzed court order re: plaintiffs amended response.	0.10	18.00
		L250 Other Written Motions and Submissions	180.00/hr	
	MT	Review and analyzed correspondence between the parties re: expert rebuttals, expert opinions, settlement conference, and next steps.	0.20	36.00
		L120 Analysis/Strategy	180.00/hr	
10/20/2021	MT	Review and analyzed correspondence from K Hov's counsel re: disclosure statement.	0.10	18.00
		L310 Written Discovery	180.00/hr	
	MT	Drafted correspondence to adjuster re: [REDACTED]	0.20	36.00
		L130 Experts/Consultants	180.00/hr	
	MT	Review and analyzed Plaintiff's 9th Supplemental Disclosure and attachments (~40 pgs) in preparation of ensuring all relevant documents will be provided to expert.	0.50	90.00
		L310 Written Discovery	180.00/hr	
10/21/2021	SRG	Reviewed miscellaneous disclosures and disclosed documents in preparation for deposition of K.Hov's 30b6 witness. ~250 pages	1.30	253.50
		L330 Depositions	195.00/hr	
10/22/2021	MT	Teleconference with expert to discuss [REDACTED]	0.30	54.00
		L130 Experts/Consultants	180.00/hr	
	SRG	Reviewed and analyzed corporate counsel [REDACTED].	0.10	19.50
			195.00/hr	

			<u>Hrs/Rate</u>	<u>Amount</u>
		L110 Fact Investigation/Development		
10/22/2021	SRG	Reviewed file in preparation for response to corporate counsel's request for information .1	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Reviewed H.Davies correspondence regarding reservation of scope of anticipated deposition testimony of k.hovs representative..	0.10 195.00/hr	19.50
		L330 Depositions		
	SRG	Teleconference with corporate counsel Paul Frame regarding client representation, corporate and project documents and appearance.	0.30 195.00/hr	58.50
		L120 Analysis/Strategy		
	SRG	Reviewed correspondence and Plaintiff deposition exhibits in preparation for K.Hov 30B6 deposition.	0.90 195.00/hr	175.50
		L330 Depositions		
10/25/2021	SRG	Reviewed correspondence and additional deposition exhibits provided by Plaintiff in preparation for K.Hov deposition.	0.20 195.00/hr	39.00
		L330 Depositions		
	SRG	Appear for Deposition of K. Hov Person Most Knowledgeable Jim Harvey.	5.60 195.00/hr	1,092.00
		L330 Depositions		
10/26/2021	SRG	Teleconference to H.Davies regarding representation of Desert Vista and request for information on repairs and investigation of claims	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
10/27/2021	MT	Review and analyzed subpoena duces tecum received from Plaintiff directed at Trestle Management Group.	0.10 180.00/hr	18.00
		L320 Document Production		
	MT	Review and analyzed correspondence between Plaintiff and Defendant re: proper notice of defects in unit and pool canopy to inspect defected units and supplemental expert reports. Reviewed attached notice letters.	0.30 180.00/hr	54.00
		L120 Analysis/Strategy		
	SRG	Teleconference from expert regarding expert investigation and information needed to complete analysis.	0.20 195.00/hr	39.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L110 Fact Investigation/Development		
10/28/2021	MT Teleconference with client to discuss [REDACTED] [REDACTED]	0.30 180.00/hr	54.00
	L120 Analysis/Strategy		
MT	Review and analyzed relevant correspondence, 8th and 9th supplemental disclosure statement only, and previous status reports in preparation of drafting updated impact status report to carrier.	0.30 180.00/hr	54.00
	L120 Analysis/Strategy		
MT	Drafted updated impact status report to carrier regarding [REDACTED] [REDACTED] s.	1.60 180.00/hr	288.00
	L120 Analysis/Strategy		
10/29/2021	SRG Teleconference from Plaintiff's counsel regarding outstanding written discovery responses. .2	0.20 195.00/hr	39.00
	L310 Written Discovery		
11/1/2021	MT Drafted correspondence to client re: [REDACTED]	0.10 180.00/hr	18.00
	L120 Analysis/Strategy		
MT	Teleconference with expert to discuss need for inspection of repairs and discuss additional disclosure findings related to repairs and renco exposure.	0.30 180.00/hr	54.00
	L130 Experts/Consultants		
SRG	Reviewed and analyzed correspondence and Third-Party Defendant Sargon Masonry Construction, LLC's Lay Witnesses Disclosure for potential joinder in naming witnesses.	0.10 195.00/hr	19.50
	L310 Written Discovery		
SRG	Reviewed and analyzed Third-Party Defendant Sargon Masonry Construction, LLC's Lay Witnesses Disclosure .2	0.20 195.00/hr	39.00
	L310 Written Discovery		
SRG	Reviewed file and parties' disclosure statements to supplement client's disclosure of lay witnesses to comply with scheduling order.	0.30 195.00/hr	58.50
	L310 Written Discovery		

		<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2021	SRG	0.80	156.00
		195.00/hr	
	Revise and supplement updated status report and liability impact based [REDACTED]		
	L120 Analysis/Strategy		
11/2/2021	MT	0.10	18.00
		180.00/hr	
	Review and analyzed and drafted correspondence to/from plaintiff's counsel regarding inspection of unit requiring repair and specific details related to affect on deadlines and litigation.		
	L120 Analysis/Strategy		
	SRG	0.10	19.50
		195.00/hr	
	Draft H.Davies response to inquiry regarding expert investigation and discovery.		
	L340 Expert Discovery		
	SRG	0.10	19.50
		195.00/hr	
	Reviewed H.Davies correspondence and request for information related to expert investigation and discovery.		
	L340 Expert Discovery		
	SRG	0.20	39.00
		195.00/hr	
	Teleconference from Claimant counsel regarding claims and settlement negotiations .2		
	L160 Settlement/Non-Binding ADR		
	SRG	0.20	39.00
		195.00/hr	
	Teleconference from K.Hov regarding expert investigation into new claims and allegations to join in Claimant request.		
	L340 Expert Discovery		
11/3/2021	MT	0.10	18.00
		180.00/hr	
	Review and analyzed correspondence from K Hov counsel re: access to units where repairs were conducted including Renco's involvement.		
	L120 Analysis/Strategy		
	SRG	0.10	19.50
		195.00/hr	
	Reviewed and analyzed defense counsel S.Best correspondence regarding mediation and settlement negotiations. .1		
	L160 Settlement/Non-Binding ADR		
	SRG	0.10	19.50
		195.00/hr	
	Reviewed and analyzed H.Davies correspondence regarding investigation of claimant's defect allegations. .1		
	L340 Expert Discovery		
11/4/2021	MT	0.10	18.00
		180.00/hr	
	Drafted correspondence to client re: [REDACTED]		
	L120 Analysis/Strategy		

			<u>Hrs/Rate</u>	<u>Amount</u>
11/4/2021	MT	Drafted correspondence to expert re: inspection, details, and expert opinion in preparation of upcoming inspection. L130 Experts/Consultants	0.10 180.00/hr	18.00
	MT	Teleconference with expert to discuss [REDACTED] L130 Experts/Consultants	0.20 180.00/hr	36.00
	MT	Review and analyzed claim file including complaint, third-party complaint, status reports, expert reports, expert correspondence, and disclosures/discovery in preparation of drafting pre-mediation memorandum for mediation. L160 Settlement/Non-Binding ADR	0.60 180.00/hr	108.00
	MT	Began drafting pre-mediation report for adjuster re: [REDACTED] L160 Settlement/Non-Binding ADR	2.20 180.00/hr	396.00
	SRG	Teleconference to K.Hov counsel requesting information regarding Homeowners close of escrow dates for each unit, details related to prior repairs, and other discovery. L310 Written Discovery	0.20 195.00/hr	39.00
11/5/2021	MT	Review and analyzed and drafted correspondence to/from expert regarding expert opinion draft and Plaintiff's supplemental opinion in preparation of reviewing draft. L130 Experts/Consultants	0.10 180.00/hr	18.00
	MT	Review and analyzed and drafted correspondence to/from client's corporate counsel re: [REDACTED] L120 Analysis/Strategy	0.20 180.00/hr	36.00
11/8/2021	MT	Drafted correspondence to adjuster re: [REDACTED] L120 Analysis/Strategy	0.10 180.00/hr	18.00
	MT	Teleconference with K Hov counsel re: upcoming inspection details. L120 Analysis/Strategy	0.20 180.00/hr	36.00

			<u>Hrs/Rate</u>	<u>Amount</u>
11/8/2021	SRG	Reviewed Plaintiff correspondence regarding expert discovery and scope of inspection .1 L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG	Reviewed K.Hov correspondence regarding expert discovery and scope of inspection .1 L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG	Teleconference with K.Hov regarding information related to investigation of claims and prior repairs. L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG	Teleconference with client regarding [REDACTED] [REDACTED] L110 Fact Investigation/Development	0.30 195.00/hr	58.50
11/9/2021	MT	Review and analyzed and drafted correspondence to/from expert in preparation of inspection on Friday. L130 Experts/Consultants	0.20 180.00/hr	36.00
	MT	Review and analyzed and drafted correspondence to/from K Hov counsel re: K Hov's responses to Renco's written discovery. L310 Written Discovery	0.20 180.00/hr	36.00
	MT	Teleconference with expert to discuss details of inspection on 12th with expert and client, discuss expert report draft, and disclosures. L130 Experts/Consultants	0.30 180.00/hr	54.00
	MT	Teleconference with K Hov counsel to discuss expert findings and issues with roofing in preparation of mediation and resolution. Discussed outstanding factual questions regarding expert opinions. L120 Analysis/Strategy	0.50 180.00/hr	90.00
	SRG	Teleconference from K.Hov regarding its outstanding discovery responses .2 L310 Written Discovery	0.20 195.00/hr	39.00
	SRG	Appear for conference call with H.Davies regarding reserve study, alleged defects, repairs, and other issues. L110 Fact Investigation/Development	0.40 195.00/hr	78.00

			<u>Hrs/Rate</u>	<u>Amount</u>
11/10/2021	MT	Review and analyzed and drafted correspondence to/from Plaintiff and Defendant counsel re: upcoming inspection of repairs and defects.	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Teleconference with expert to discuss [REDACTED]	0.20 180.00/hr	36.00
		L130 Experts/Consultants		
11/11/2021	MT	Review and analyzed and drafted correspondence to/from client and client corporate counsel re: inspection.	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		
	MT	Teleconference with expert to [REDACTED]	0.30 180.00/hr	54.00
		L130 Experts/Consultants		
	MT	Teleconference with client to [REDACTED]	0.40 180.00/hr	72.00
		L120 Analysis/Strategy		
11/12/2021	DL	Attended and oversaw inspection of with expert Kevin Marler inspecting work done by Renco at 3125 negotiations 71st Street Scottsdale Arizona 85251. Units 3105 3111 3115 3117 3127 3110 3122 3113 3109 3125 3121. Note that different sections (interior/exterior/roof) may have been inspected at different times of the same unit.	2.80 180.00/hr	504.00
		L110 Fact Investigation/Development		
	DL	Attended and oversaw inspection of with expert Kevin Marler inspecting work done by Renco at 3125 negotiations 71st Street Scottsdale Arizona 85251. Units 3124 3118 3106 3116 3112 3110 3104.	4.80 180.00/hr	864.00
		L110 Fact Investigation/Development		
11/15/2021	MT	Review and analyzed plaintiff's 10th supplemental disclosure with attachments (~100) re: nautulus repair estimates, a various certified copies of articles of organization and amendments.	0.80 180.00/hr	144.00
		L310 Written Discovery		
11/16/2021	SRG	Teleconference with plaintiff regarding mediation and resolution of claims against client .2	0.20 195.00/hr	39.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L160 Settlement/Non-Binding ADR		
11/17/2021	MT Review and analyzed and drafted correspondence to/from plaintiff's counsel re: stipulation and proposed order to amend deadlines in preparation of filing.	0.10 180.00/hr	18.00
	L250 Other Written Motions and Submissions		
	MT Review, analyzed and revised stipulation and proposed order to extend deadlines as drafted by the parties in preparation of conducting mediation in hopes of resolution.	0.30 180.00/hr	54.00
	L250 Other Written Motions and Submissions		
	SRG Reviewed mediator correspondence and request for information.	0.10 195.00/hr	19.50
	L110 Fact Investigation/Development		
11/18/2021	MT Review and analyzed initial disclosure statement, answer, experts, and relevant correspondence in preparation of drafting first supplemental disclosure statement re: lay witnesses and expert witnesses.	0.40 180.00/hr	72.00
	L310 Written Discovery		
	MT Drafted first supplemental disclosure statement re: lay witnesses and expert witnesses.	1.10 180.00/hr	198.00
	L310 Written Discovery		
	SRG Reviewed and analyzed T.Wales correspondence regarding deposition testimony from K.Hov witness on various 30B6 topics.	0.10 195.00/hr	19.50
	L330 Depositions		
	SRG Reviewed and analyzed counsel Manship correspondence regarding deposition testimony from K.Hov witness on various 30B6 topics.	0.10 195.00/hr	19.50
	L330 Depositions		
11/19/2021	MT Drafted correspondence to expert re: k hov's responses to written discovery and disclosure in preparation of teleconference to discuss expert findings.	0.20 180.00/hr	36.00
	L130 Experts/Consultants		
	MT Review and analyzed K Hov's second supplemental disclosure statement in conjunction with responses to written discovery.	0.30 180.00/hr	54.00
	L310 Written Discovery		

		<u>Hrs/Rate</u>	<u>Amount</u>
11/19/2021	MT	Review and analyzed K Hov's responses to written discovery, specifically responses to RFAs, RFPs, and NUIs (18 pgs). L310 Written Discovery	0.70 180.00/hr 126.00
11/22/2021	MT	Teleconference with client to discuss [REDACTED] [REDACTED] L130 Experts/Consultants	0.50 180.00/hr 90.00
	MT	Review and analyzed previous status reports of summary and analysis of plaintiff and defendant expert reports and supp reports, and previous notes and disclosures in preparation of teleconference with our experts to discuss initial findings of inspection. L130 Experts/Consultants	1.10 180.00/hr 198.00
	MT	Teleconference with expert Kevin Marler who attended 11.12.21 inspection to discuss [REDACTED] [REDACTED]. L130 Experts/Consultants	1.30 180.00/hr 234.00
	SRG	Reviewed plaintiff correspondence and request for information regarding client's written discovery propounded on plaintiff. L310 Written Discovery	0.10 195.00/hr 19.50
11/23/2021	SRG	Teleconference from Plaintiff counsel regarding outstanding written discovery responses to client's requests. L310 Written Discovery	0.30 195.00/hr 58.50
11/24/2021	MT	Review and analyzed court order granting stipulation to extend. L250 Other Written Motions and Submissions	0.10 180.00/hr 18.00
	SRG	Phone call with experts further discussing defect allegations/claims implicating work. L340 Expert Discovery	0.90 195.00/hr 175.50
11/29/2021	MT	Review and analyzed Plaintiff Gallery's responses to Renco's written discovery, specifically responses to request for admission and request for production of documents. L310 Written Discovery	0.60 180.00/hr 108.00
	MT	Review and analyzed Plaintiff Gallery's responses to Renco's written discovery, specifically responses to non-uniform interrogatories.	1.00 180.00/hr 180.00

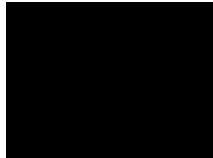
		<u>Hrs/Rate</u>	<u>Amount</u>
L310 Written Discovery			
11/30/2021	MT	Review and analyzed Plaintiff and Defendants third stipulation to extend MSJ response deadline while parties work to settlement and reviewed proposed order.	0.30 180.00/hr 54.00
L250 Other Written Motions and Submissions			
SRG		Reviewed Mediator correspondence (x2) regarding settlement negotiations and procedure for mediation .2	0.20 195.00/hr 39.00
L160 Settlement/Non-Binding ADR			
SRG		Teleconference to Mediator L.Fleischman for mediation communciation and commencement of background discussions for settlement negotiations .	0.20 195.00/hr 39.00
L160 Settlement/Non-Binding ADR			
For professional services rendered		<u>88.40</u>	<u>\$15,747.00</u>
Additional Charges :			
		<u>Qty</u>	
11/18/2021	TLO	Expense for mediation services provided by The Fleischman Law Firm, dated November 18, 2021 (1/7 portion of expense billed)	1 333.33
Total costs			<u>\$333.33</u>
Total amount of this bill			<u>\$16,080.33</u>
Previous balance			[REDACTED]
9/28/2021		Write off for incorrect rate (MJ/KM)	[REDACTED]
11/4/2021		Payment received from NCS - thank you. Check No. 45494	[REDACTED]
11/18/2021		Write off for invoice no. 50007	[REDACTED]
Total payments and adjustments			[REDACTED]
Balance due			[REDACTED]

Timekeeper Summary

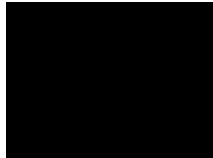
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Shannon Huff- Partner	23.00	195.00	\$4,485.00
Derick Lysene	7.60	180.00	\$1,368.00
Mohamad Tokko	51.80	180.00	\$9,324.00

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Misty James - Paralegal	5.10	95.00	\$484.50
Tracy O'Brien - Paralegal	0.90	95.00	\$85.50

Total fees to date (inclusive of this bill)



Total costs to date (inclusive of this bill)



Rai Duer Huff P.C.

3033 North Central
Avenue, Suite 500
Phoenix, AZ 85012
Tax ID No.: 20-1799878

March 24, 2022

Invoice submitted to:

National Claims Service
Liz Del Rosario

In Reference To: Case Name: Renco adv. K. Hovnarian
Project Name: The Gallery in Scottsdale
Claim Number: 46772
Date of Loss:
Cause Number: CV2020-008714
Attn: Liz Del Rosario

Invoice # 51161

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>	
12/1/2021	MT	Review and analyzed plaintiff's expert report, supplemental rebuttal report, and K Hov's expert report and supplemental report for sections that only implicate client in preparation of drafting pre-mediation report to carrier re [REDACTED]	1.00 180.00/hr	180.00
		L130 Experts/Consultants		
	MT	Drafted premediation report to carrier to include [REDACTED]	1.50 180.00/hr	270.00
		L160 Settlement/Non-Binding ADR		
12/2/2021	MT	Teleconference with adjuster Alexis to discuss upcoming mediation [REDACTED]	0.20 180.00/hr	36.00
		L160 Settlement/Non-Binding ADR		
	MT	Teleconference with mediator to discuss mediation on 12/30.	0.20 180.00/hr	36.00
		L160 Settlement/Non-Binding ADR		
	MT	Teleconference with expert to discuss mediation on 12/30 and discuss [REDACTED]	0.30 180.00/hr	54.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L130 Experts/Consultants		
12/2/2021	MT Teleconference with client to discuss mediation and prepare for mediation on 12/30. [REDACTED]	0.30 180.00/hr	54.00
	L160 Settlement/Non-Binding ADR		
	MT Drafted premediation report by making final revisions to some sections and proofreading.	0.30 180.00/hr	54.00
	L160 Settlement/Non-Binding ADR		
	MT Finished drafting premediation report to carrier. [REDACTED]	1.80 180.00/hr	324.00
	L160 Settlement/Non-Binding ADR		
	SRG Teleconference with MC Consultants regarding further discussion of scope of issues and defenses for mediation memo to mediator and strategy. 3	0.30 195.00/hr	58.50
	L340 Expert Discovery		
	SRG Supplement and revise premediation report, including [REDACTED]	2.30 195.00/hr	448.50
	L160 Settlement/Non-Binding ADR		
12/3/2021	SRG Phone call to K.Hov counsel regarding K.Hov's expert opinions and cost of repair for mediation and expert discovery and reports.	0.60 195.00/hr	117.00
	L340 Expert Discovery		
12/6/2021	MT Review and analyzed relevant documents including pre-mediation report, expert opinions, disclosures, and relevant correspondence in preparation of drafting mediation memo to mediator in preparation of mediation; drafting outline of memo.	0.50 180.00/hr	90.00
	L160 Settlement/Non-Binding ADR		
	MT Drafted first part of mediation memorandum in preparation of mediation.	0.70 180.00/hr	126.00
	L160 Settlement/Non-Binding ADR		

			<u>Hrs/Rate</u>	<u>Amount</u>
12/7/2021	MT	Review and analyzed court order granting stipulation to extend plaintiff's amended response to K Hov MSJ. L240 Dispositive Motions	0.10 180.00/hr	18.00
	MT	Drafted mediation memorandum for mediator in preparation of mediation and included factual overview, causes of actions/claims, legal defense analysis, expert opinion analysis, and settlement (~16 pgs drafted). L160 Settlement/Non-Binding ADR	3.80 180.00/hr	684.00
	SRG	Reviewed order regarding pending Motion for Summary Judgment. L240 Dispositive Motions	0.10 195.00/hr	19.50
12/8/2021	MT	Proofread and revised mediation memorandum in preparation of mediation. L160 Settlement/Non-Binding ADR	0.50 180.00/hr	90.00
12/9/2021	SRG	Appear for meeting with K.Hov, K.Hov's experts, and Renco expert 1.4 L340 Expert Discovery	1.40 195.00/hr	273.00
12/10/2021	MT	Drafted correspondence to client regarding the [REDACTED] [REDACTED] L120 Analysis/Strategy	0.10 180.00/hr	18.00
	MT	Drafted correspondence to expert Chad regarding the emergency inspection and temporary repairs as notified by plaintiff [REDACTED] [REDACTED] L130 Experts/Consultants	0.10 180.00/hr	18.00
	MT	Drafted correspondence to adjuster Alexis regarding the emergency inspection and temporary repairs [REDACTED] [REDACTED] L120 Analysis/Strategy	0.20 180.00/hr	36.00
	MT	Teleconference with plaintiff's attorney to discuss details of emergency need to repair a leak of tenant of one of the units in Gallery to determine if client could be implicated to have representative or expert attend emergency inspection. L110 Fact Investigation/Development	0.30 180.00/hr	54.00

			<u>Hrs/Rate</u>	<u>Amount</u>
12/10/2021	SRG	Phone call from opposing counsel regarding notice of new leak at the project and expert investigation for emergency repair.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	SRG	Revise and supplement Confidential Mediation Memorandum to Mediator per order and in preparation for mediation appearance including: defenses to legal claims and construction defect allegations implicating client. (18 pages)	0.80 195.00/hr	156.00
		L160 Settlement/Non-Binding ADR		
12/13/2021	MT	Drafted correspondence to client [REDACTED].	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Drafted correspondence to adjuster to update her [REDACTED].	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Prepared for today's emergency inspection by reviewing relevant correspondence and reviewing disclosures of K. Hovnarian related to previous emergency repairs to determine if there is a common issue.	0.40 180.00/hr	72.00
		L120 Analysis/Strategy		
	MT	Teleconference with expert to discuss and prepare for today's inspection at Gallery re: strategy regarding [REDACTED].	0.60 180.00/hr	108.00
		L130 Experts/Consultants		
	MT	Attended emergency inspection and repair at Gallery Property 7124 N. 71st unit at the smoke detector and roof (no travel time included in time entry)	1.30 180.00/hr	234.00
		L130 Experts/Consultants		
12/15/2021	MT	Teleconference with adjuster Alexis Grant to discuss conference with K Hov's experts re: [REDACTED].	0.30 180.00/hr	54.00
		L120 Analysis/Strategy		
	MT	Teleconference with mediator to discuss upcoming mediation re: each subcontractor and likelihood of resolution given client duplication	0.40 180.00/hr	72.00
		L160 Settlement/Non-Binding ADR		

		<u>Hrs/Rate</u>	<u>Amount</u>	
12/15/2021	MT	Drafted mediation memorandum by making additions and revisions to the defenses to liability by providing more details as to each experts' findings for each section of alleged defect that could implicate client so mediator has a better idea of the details of the findings (added 7 additional pages).	2.40 180.00/hr	432.00
		L160 Settlement/Non-Binding ADR		
	SRG	Revised liability analysis in mediator requested memo based on new information provided by K.Hov and lack of demand.	0.30 195.00/hr	58.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed Third-Party Defendant LeBlanc Building Co., Inc.'s Mediation Memorandum. 10 page	0.30 195.00/hr	58.50
		L160 Settlement/Non-Binding ADR		
12/16/2021	MT	Review and analyzed notes from expert teleconference re: inspection and created outline in preparation of drafting status report on emergency inspection and repair.	0.40 180.00/hr	72.00
		L120 Analysis/Strategy		
	MT	Proofread and revised mediation memorandum before sending to mediator.	0.40 180.00/hr	72.00
		L160 Settlement/Non-Binding ADR		
	MT	Review and analyzed pre mediation report, mediation memo, notes on discussions with expert in preparation of expert conference call to discuss recent inspection.	0.50 180.00/hr	90.00
		L130 Experts/Consultants		
	MT	Review and analyzed photos take by expert at emergency inspection and emergency repair to see extent of repairs.	0.50 180.00/hr	90.00
		L130 Experts/Consultants		
	MT	Drafted status report to carrier re: [REDACTED]	1.20 180.00/hr	216.00
		L120 Analysis/Strategy		
	MT	Teleconference with expert Chad to discuss recent inspection, recent repairs, [REDACTED].	1.30 180.00/hr	234.00
		L130 Experts/Consultants		

		<u>Hrs/Rate</u>	<u>Amount</u>
12/16/2021	SRG	0.30 195.00/hr	58.50
	Revise and supplement carrier correspondence and update/impact of emergency roof repair.		
	L160 Settlement/Non-Binding ADR		
12/20/2021	MT	0.30 180.00/hr	54.00
	Review and analyzed settlement demand letter received from K Hov with offer, in preparation of mediation.		
	L160 Settlement/Non-Binding ADR		
12/21/2021	MT	0.20 180.00/hr	36.00
	Teleconference with adjuster Alexis to discuss [REDACTED]		
	L120 Analysis/Strategy		
12/23/2021	MT	0.30 180.00/hr	54.00
	Review and analyzed plaintiff expert cost of repair estimate and K Hov expert cost of repair estimate in preparation of teleconference with our expert to provide and discuss our own cost of repair estimate in preparation of mediation.		
	L130 Experts/Consultants		
	MT	0.60 180.00/hr	108.00
	Teleconference with expert West to discuss cost of repair estimate per unit for areas that implicate client, [REDACTED]		
	L130 Experts/Consultants		
	MT	1.00 180.00/hr	180.00
	Prepared for mediation by review and analyze premediation report, mediation memorandum, plaintiff expert reports and CORE, K Hov expert reports and CORE, other parties' mediation memos, and settlement demand letter. Took notes and highlighted areas of emphasis.		
	L160 Settlement/Non-Binding ADR		
12/27/2021	SRG	2.30 195.00/hr	448.50
	Prepare to appear for mediation with Larry Fleischman (millions in demand - client is one of two primary targets).		
	L160 Settlement/Non-Binding ADR		
12/28/2021	SRG	0.20 195.00/hr	39.00
	Phone call from MC Consultants requesting information, general defense, and expert opinions issued by other entities.		
	L340 Expert Discovery		
	SRG	0.40 195.00/hr	78.00
	Phone call to K.Hov regarding mediation and settlement demand details.		
	L160 Settlement/Non-Binding ADR		

		<u>Hrs/Rate</u>	<u>Amount</u>
12/29/2021	RR Prepare for mediation including review of Plaintiff, developer, and sub expert opinion reports, parties disclosures and parties mediation memorandum (2 attorney participation authorized by Liz Del Rosario on 12/29/2021) L160 Settlement/Non-Binding ADR	5.60 195.00/hr	1,092.00
	SRG Reviewed carrier correspondence regarding assignment of new adjuster and request for information for mediation. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG Contact with the City of Scottsdale to request information on behalf of adjuster necessary for mediation - per Liz. L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG Phone call with opposing counsel H.Davies regarding mediation, demand, claims and other project general information. L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	SRG Drafted new adjuster response to information needed for mediation. x2 L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	SRG Client phone call regarding mediation and settlement demand. L160 Settlement/Non-Binding ADR	0.40 195.00/hr	78.00
	SRG Phone call with Larry Fleischman (mediator) regarding claims, demand, and negotiations. X2 L160 Settlement/Non-Binding ADR	0.40 195.00/hr	78.00
	SRG Review and analyze project deeds and recorded documents on assessor and planning and zoning department at the request of adjuster for mediation. See 12/29 emails. L110 Fact Investigation/Development	0.70 195.00/hr	136.50
12/30/2021	RR Review and analyze and draft correspondence to C. Wamsley re: [REDACTED] L120 Analysis/Strategy	0.30 195.00/hr	58.50
	RR Review and analyze and draft correspondence to L. Fleishcman re: mediation status (x2) L160 Settlement/Non-Binding ADR	0.30 195.00/hr	58.50

		<u>Hrs/Rate</u>	<u>Amount</u>	
12/30/2021	RR	Attend mediation per authorization of Liz Del Rosario (2 attorney authorization granted on 12/29/2021)	6.50 195.00/hr	1,267.50
		L160 Settlement/Non-Binding ADR		
	MT	Teleconference with expert Chad to discuss additional cost of repair numbers in preparation of mediation.	0.40 180.00/hr	72.00
		L130 Experts/Consultants		
1/3/2022	MT	Review and analyzed detailed correspondence from mediator regarding outcome of mediation, plaintiff and k hov's claimed damages and client's exposure in hopes of a resolution.	0.20 180.00/hr	36.00
		L160 Settlement/Non-Binding ADR		
	MT	Drafted mediation status update report to client and corporate counsel re: details and outcome of mediation, mediator's analysis and position, and recommendations in proceeding.	0.50 180.00/hr	90.00
		L160 Settlement/Non-Binding ADR		
	MT	Drafted mediation status update report to carrier re: details and outcome of mediation, mediator's analysis and position, and recommendations in proceeding.	0.60 180.00/hr	108.00
		L160 Settlement/Non-Binding ADR		
	SRG	Supplement carrier post mediation correspondence and impact on case and issues.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Supplement client correspondence regarding post mediation and next steps towards resolution.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed mediator correspondence, summary of settlement negotiations, various construction, legal and additional insured issues for discussion.	0.20 195.00/hr	39.00
		L160 Settlement/Non-Binding ADR		
1/4/2022	MT	Teleconference with client's corporate counsel to discuss [REDACTED]	0.50 180.00/hr	90.00
		[REDACTED]		
		L120 Analysis/Strategy		
	MT	Review and analyzed mediation memo, pre-mediation report, parties' expert reports, and court orders re: deadlines in preparation of drafting updated liability status report to client [REDACTED]	0.50 180.00/hr	90.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	[REDACTED]		
	L120 Analysis/Strategy		
1/4/2022 MT	Drafted updated liability analysis status report to carrier outlining [REDACTED]	2.30 180.00/hr	414.00
	L120 Analysis/Strategy		
SRG	Drafted mediator response regarding mediation and settlement negotiations.	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
SRG	Reviewed mediator correspondence regarding mediation and settlement negotiations.	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
SRG	Phone call with mediator Fleischman regarding conference with adjusters to address mediation, continued negotiations, and issues for resolution.	0.30 195.00/hr	58.50
	L160 Settlement/Non-Binding ADR		
1/5/2022 MT	Drafted, revised, and proofread updated liability report by making additions re: expert strategy and analysis, in adopting defendant's expert opinions, additional clarification on expert damage figures, and additional recommendations.	0.60 180.00/hr	108.00
	L120 Analysis/Strategy		
SRG	Drafted adjuster regarding [REDACTED]	0.10 195.00/hr	19.50
	L120 Analysis/Strategy		
RR	Attend extended telephonic conference with C. Wamsley at NCS re: [REDACTED]	0.60 195.00/hr	117.00
	L120 Analysis/Strategy		
RR	Update liability analysis given expert opinions of G.C. to answer questions by National Claims office	0.80 195.00/hr	156.00
	L120 Analysis/Strategy		
RR	Prepare for extended telephonic conference with C. Wamsley re: [REDACTED]	0.90 195.00/hr	175.50

		<u>Hrs/Rate</u>	<u>Amount</u>
	L120 Analysis/Strategy		
1/6/2022	MT Review and analyzed and drafted correspondence to/from client's corporate counsel re: [REDACTED]	0.30 180.00/hr	54.00
	L120 Analysis/Strategy		
	MT Review and analyzed plaintiff's 11th supplemental disclosure and attachments (~1000 of 4000+ total pgs), which include documents disclosed from Trestle property manager of gallery per subpoena, including contracts, plans, proposals, landscape etc. As approved by adjuster Liz in email sent to her dated 1.3.22.	2.30 180.00/hr	414.00
	L310 Written Discovery		
	SRG Phone call to expert regarding strategy for final expert reports and cost of repair.	0.20 195.00/hr	39.00
	L340 Expert Discovery		
1/7/2022	MT Review and analyzed and drafted correspondence to/from client's corporate counsel re: his conversation with mediator on this matter.	0.10 180.00/hr	18.00
	L160 Settlement/Non-Binding ADR		
	MT Review and analyzed plaintiff's 12th supplemental disclosure and attachments (~65+ pgs) re: nautilus emergency repairs and photos for unit 3124.	0.60 180.00/hr	108.00
	L310 Written Discovery		
	MT Review and analyzed plaintiff's 11th supplemental disclosure statement and attachments (bates 1003-2003; 1000 of 4000+ pgs) re: subpoena documents from Trestle, previous property manager and all related documents for Gallery Project. Approved via email sent to adjuster Liz on 1/3/22.	2.00 180.00/hr	360.00
	L310 Written Discovery		
	SRG Reviewed and analyzed Mediator correspondence regarding mediation and settlement negotiations .1	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
	SRG Supplement and revise adjuster's liability analysis report with [REDACTED]	1.30 195.00/hr	253.50
	L340 Expert Discovery		

		<u>Hrs/Rate</u>	<u>Amount</u>
1/10/2022	SRG Conference with client and corporate counsel to discuss mediation, [REDACTED] L110 Fact Investigation/Development	0.70 195.00/hr	NO CHARGE
	MT Teleconference with client, client's corporate counsel to discuss [REDACTED] L120 Analysis/Strategy	0.70 180.00/hr	126.00
	MT Review and analyzed plaintiff's 11th supplemental disclosure and attachments (~1000 pages; bates 2004-3012 (of 4000+)), re: previous HOA property manager disclosed documents via subpoena by plaintiff. As approved in email with adjuster Liz on 1/3/22. L310 Written Discovery	2.40 180.00/hr	432.00
	SRG Phone call from Mediator regarding settlement negotiations .1 L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Phone call from MC (expert) regarding development of expert opinions for disclosure. L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG Reviewed information provided by client in preparation for client call with corporate counsel [REDACTED] L160 Settlement/Non-Binding ADR	0.30 195.00/hr	58.50
1/11/2022	MT Review and analyzed plaintiff's 11th supplemental disclosure statement and attachments (~1060+ pgs) (bates 3013-4065), re: previous HOA's documents including plans, financial reports, K Hov's work, other relevant documents, and construction photos. As approved via email to adjuster Liz dated 1/3/2022. L310 Written Discovery	2.20 180.00/hr	396.00
	SRG Reviewed Mediator correspondence regarding settlement negotiations .1 L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Call to Larry Fleischman regarding status of case and settlement discussion. L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/18/2022	SRG Reviewed corporate counsel correspondence regarding s [REDACTED] [REDACTED]. L120 Analysis/Strategy	0.10 195.00/hr	19.50
	SRG Drafted client regarding [REDACTED]. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed client correspondence regarding [REDACTED] L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
1/20/2022	MT Drafted correspondence to expert Chad at MC Consultants re: emergency inspection and roof leak. L130 Experts/Consultants	0.10 180.00/hr	18.00
	MT Drafted correspondence to client to provide information on new roof leak identified by Plaintiff, emergency inspection to repair leaks, and update on this matter. L120 Analysis/Strategy	0.20 180.00/hr	36.00
	MT Drafted correspondence to carrier to provide information on new roof leak identified by Plaintiff, emergency inspection to repair leaks, and authority to attend. L120 Analysis/Strategy	0.20 180.00/hr	36.00
	MT Teleconference with K. Hov counsel to discuss the motion to dismiss filed for one of the K Hov entities and discuss the new emergency inspection for a new leak. L120 Analysis/Strategy	0.30 180.00/hr	54.00
	SRG Drafted client and corporate counsel response regarding s [REDACTED] [REDACTED]. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed corporate counsel correspondence regarding settlement negotiations. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed client Eric correspondence regarding continued [REDACTED]. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50

		<u>Hrs/Rate</u>	<u>Amount</u>
1/20/2022	SRG Reviewed and analyzed correspondence and Chas Roberts Air Conditioning, Inc.'s Notice of Non-Parties at Fault. L250 Other Written Motions and Submissions	0.10 195.00/hr	19.50
	SRG Phone call from mediator regarding status of settlement negotiations and continued case discussion. L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	SRG Reviewed correspondence, Proposed Stipulation and Order for Dismissal of Plaintiff's against K.Hov with prejudice. L250 Other Written Motions and Submissions	0.20 195.00/hr	39.00
	SRG Phone call to Mediator Fleischman regarding impact of Stipulation and Order for Dismissal of Plaintiff's Claims and impact on client's claims. L250 Other Written Motions and Submissions	0.20 195.00/hr	39.00
1/21/2022	MT Drafted correspondence to our expert Chad to discuss upcoming expert report disclosure and details of opinions and findings. L130 Experts/Consultants	0.20 180.00/hr	36.00
	MT Teleconference with client and client corporate counsel to discuss [REDACTED]. L120 Analysis/Strategy	0.70 180.00/hr	126.00
	SRG Reviewed corporate counsel input on settlement strategy. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed client request for information for mediation. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed correspondence and Notice of Settlement for Chas Roberts Air Conditioning, Inc. L250 Other Written Motions and Submissions	0.10 195.00/hr	19.50
	SRG Reviewed all counsel correspondence regarding outstanding discovery and expert discovery for input. L340 Expert Discovery	0.10 195.00/hr	19.50

		<u>Hrs/Rate</u>	<u>Amount</u>
1/21/2022	SRG Appear for client strategy and settlement call. L160 Settlement/Non-Binding ADR	0.40 195.00/hr	78.00
1/26/2022	MT Review and analyzed court order granting dismissal of one defendant/third party plaintiff, K Hov companies of AZ. L250 Other Written Motions and Submissions	0.10 180.00/hr	18.00
	MT Attended emergency inspection at Project site Gallery Townhomes unit 3112 to inspect leak on roof/ceiling. Attended with mediator. As approved by adjuster Liz in email dated 1.25.2022 (no travel time included in time entry) L130 Experts/Consultants	1.20 180.00/hr	216.00
	SRG Reviewed expert correspondence regarding investigation of claims and analysis for defense. L340 Expert Discovery	0.10 195.00/hr	19.50
1/27/2022	MT Drafted correspondence to client to provide analysis of yesterday's emergency inspection at the Gallery project and next steps. L130 Experts/Consultants	0.10 180.00/hr	18.00
	MT Drafted correspondence to plaintiff's counsel re: yesterday's inspection and proper description of details of inspection to save costs. L120 Analysis/Strategy	0.20 180.00/hr	36.00
	MT Drafted correspondence to carrier to provide review and analysis of yesterday's emergency inspection at the Gallery project and next steps. L130 Experts/Consultants	0.20 180.00/hr	36.00
	SRG Revise and supplement updated impact report regarding emergency roof leak and repairs. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG Revise and supplement Plaintiff correspondence regarding inadequate notice of emergency leak and notice. L340 Expert Discovery	0.10 195.00/hr	19.50
1/28/2022	MT Review and analyzed court order of dismissal of third-party def Chas Roberts AC only after notice of settlement filed.	0.10 180.00/hr	18.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L160 Settlement/Non-Binding ADR		
1/28/2022 MT	Review and analyzed expert MC Consultant, Chad's expert report draft to ensure all documents included in review [REDACTED] [REDACTED]	0.50 180.00/hr	90.00
	L130 Experts/Consultants		
SRG	Reviewed and analyzed correspondence and Chas Roberts Order for Dismissal.	0.10 195.00/hr	19.50
	L250 Other Written Motions and Submissions		
SRG	Phone call to MC Consultants regarding information for final opinions and draft expert report [REDACTED]	0.20 195.00/hr	39.00
	L340 Expert Discovery		
SRG	Expert phone call regarding strategy, opinions and expert developments.	0.30 195.00/hr	58.50
	L340 Expert Discovery		
SRG	Review and analyze MC Consultants draft expert report to analyze and determine impact on defenses/strategy; review relevant safety standards, liability analysis, and cost of repair analysis and proposal prior to disclosure. 50+ pages	1.20 195.00/hr	234.00
	L340 Expert Discovery		
SRG	Reviewed proposed expert report issued by MC Consultants in preparation for defense meeting with expert for final report. 13 pages	1.30 195.00/hr	253.50
	L340 Expert Discovery		
1/31/2022 MT	Review and analyzed co-defendant Gothic Landscaping's expert disclosure statement.	0.20 180.00/hr	36.00
	L310 Written Discovery		
MT	Teleconference with expert at MC Consultant to further discover details of cost of repair analysis in report in preparation of disclosing.	0.30 180.00/hr	54.00
	L130 Experts/Consultants		
MT	Review and analyzed previous disclosure statement, expert report drafts, and court orders re deadlines in preparation of drafting first supplemental disclosure statement to disclose experts and expert reports.	0.40 180.00/hr	72.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L310 Written Discovery		
1/31/2022	MT Teleconference with construction expert to discuss expert report draft, revisions, analysis, and cost of repair revisions in preparation of disclosing expert reports.	0.50 180.00/hr	90.00
	L130 Experts/Consultants		
	MT Teleconference with expert MC Consultants to discuss revisions and analysis to be incorporated into expert report draft, specifically [REDACTED].	0.60 180.00/hr	108.00
	L130 Experts/Consultants		
	MT Drafted first supplemental disclosure statement disclosing identity of experts, expert reports and opinions, and any additional information that needed to be updated in disclosure.	0.60 180.00/hr	108.00
	L310 Written Discovery		
	MT Review and analyzed co-defendant Liberty Constructors' second supplemental disclosure statement and expert report attachment.	0.60 180.00/hr	108.00
	L310 Written Discovery		
	SRG Supplement and revise expert disclosure statement regarding scope of anticipated testimony from each expert and supplement of lay witnesses. 25 pages	0.40 195.00/hr	78.00
	L340 Expert Discovery		
2/1/2022	SRG Drafted A.Wilkins response regarding post-mediation settlement negotiations and expert disclosure.	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
	SRG Drafted T.Fowler correspondence regarding expert discovery and request for input.	0.10 195.00/hr	19.50
	L340 Expert Discovery		
	SRG Reviewed and analyzed A.Wilkins correspondence regarding post-mediation settlement negotiations and expert disclosure.	0.10 195.00/hr	19.50
	L340 Expert Discovery		
	MT Review and analyzed plaintiff and K Hov's stipulation for fourth extension for Plaintiff to amend response to K Hov's motion for summary judgment and proposed order.	0.20 180.00/hr	36.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L240 Dispositive Motions		
2/2/2022	SRG	Phone call with MC Consultants expert regarding expert investigation, opinions and discovery.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
2/7/2022	SRG	Drafted all counsel regarding general discovery issues and lay witness disclosure.	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed Amy Wilkens correspondence regarding lay witness disclosure and request for information.	0.10 195.00/hr	19.50
		L310 Written Discovery		
	SRG	Reviewed Plaintiff Penny Manship correspondence regarding lay witness disclosure.	0.10 195.00/hr	19.50
		L310 Written Discovery		
2/9/2022	MT	Review and analyzed court order granting stipulation for fourth extension for plaintiff's amended response to K Hov's Motion for Summary Judgment.	0.10 180.00/hr	18.00
		L240 Dispositive Motions		
2/15/2022	SRG	Reviewed and analyzed LeBlanc correspondence and supplemental disclosure regarding theories of defense, scopes of anticipated expert testimony, and production of expert and expert opinions. 21 pages.	0.30 195.00/hr	58.50
		L340 Expert Discovery		
2/16/2022	SRG	Phone call from MC Consultants expert regarding investigation of claims for further handling of defense.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
2/18/2022	SRG	Reviewed and analyzed Scheduling Order and past disclosures to analyze potential for Motion to Exclude untimely reports if K.Hov. Produced additional reports next week.	0.20 195.00/hr	39.00
		L250 Other Written Motions and Submissions		
	SRG	Phone call with K.Hov regarding its intention to produce supplemental expert opinions implicating client based on additional expert discovery.	0.30 195.00/hr	58.50
		L340 Expert Discovery		

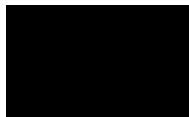
		<u>Hrs/Rate</u>	<u>Amount</u>	
2/18/2022	MT	Review and analyzed correspondence from plaintiff's counsel re potential revisions to stipulation to extend discovery.	0.10 180.00/hr	18.00
		L250 Other Written Motions and Submissions		
	MT	Review and analyzed and drafted correspondence to/from K Hov's counsel re: stipulation to extend discovery and their supplemental disclosure with expert opinions and cost of repair.	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Review and analyzed K hov's stipulation to extend discovery draft for any edits in preparation of filing. Made revisions accordingly.	0.20 180.00/hr	36.00
		L250 Other Written Motions and Submissions		
	MT	Teleconference with counsel for co-third party defendant Le Blanc counsel Stephen Best to discuss K Hov's untimely expert report and whether they will also be challenging.	0.30 180.00/hr	54.00
		L120 Analysis/Strategy		
	MT	Teleconference with counsel for co-third party defendant Liberty Constructors counsel Jason Boblick to discuss K Hov's untimely expert report and whether they will also be challenging.	0.30 180.00/hr	54.00
		L120 Analysis/Strategy		
2/22/2022	MT	Drafted correspondence to counsel for co-third party defendant Le Blanc counsel Stephen Best to further discuss our position on K Hov's untimely expert report and whether they will also be challenging.	0.20 180.00/hr	36.00
		L320 Document Production		
2/24/2022	MT	Drafted correspondence to client regarding [REDACTED]	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Review and analyzed and drafted correspondence to/from plaintiff's counsel regarding notice of another leak and inspection and plaintiff's request for information on product used on roofs.	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
2/28/2022	MT	Drafted correspondence to our expert at MC Consultants with K Hov's third supplemental disclosure and attachments of additional expert reports.	0.20 180.00/hr	36.00
		L130 Experts/Consultants		

		<u>Hrs/Rate</u>	<u>Amount</u>
2/28/2022 MT	Review and analyzed K Hov's third supplemental disclosure and attachments of expert defense report and cost of repair estimates (~50 pgs). L310 Written Discovery	1.00 180.00/hr	180.00
For professional services rendered		89.70	\$16,588.50
Additional Charges :			
		<u>Qty</u>	
1/6/2022 TLO	Expense for mediation services provided by The Fleischman Law Firm, Invoice no. 4517-01	1	104.17
Total costs			\$104.17
Total amount of this bill			\$16,692.67
Previous balance			[REDACTED]
2/3/2022 Payment received from NCS - thank you. Check No. 48494			[REDACTED]
2/17/2022 Payment received from National Claims - thank you. Check No. 48965			[REDACTED]
Total payments and adjustments			[REDACTED]
Balance due			[REDACTED]

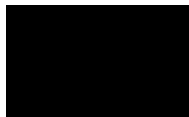
Timekeeper Summary

Name	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Rina Rai - Partner	15.00	195.00	\$2,925.00
Shannon Huff- Partner	22.90	195.00	\$4,465.50
Shannon Huff- Partner	0.70	0.00	\$0.00
Mohamad Tokko	51.10	180.00	\$9,198.00

Total fees to date (inclusive of this bill)



Total costs to date (inclusive of this bill)



Rai Duer Huff P.C.

3033 North Central
Avenue, Suite 500
Phoenix, AZ 85012
Tax ID No.: 20-1799878

June 29, 2022

Invoice submitted to:

National Claims Service
Randall Langley Jr.

In Reference To: Case Name: Renco adv. K. Hovnarian
Project Name: The Gallery in Scottsdale
Claim Number: 46772
Date of Loss:
Cause Number: CV2020-008714
Attn: Randall Langley Jr.

Invoice # 51708

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
3/3/2022 MT	Drafted correspondence to client re: notification of the roof leak and inspection for two of the Gallery units [REDACTED]. L120 Analysis/Strategy	0.10 180.00/hr	18.00
MT	Drafted correspondence to our expert MC Consultants re: emergency inspection and roof leaks of two units that will require expert appearance. L130 Experts/Consultants	0.10 180.00/hr	18.00
MT	Review and analyzed final version of stipulation to extend discovery and proposed order filed by K Hov. L250 Other Written Motions and Submissions	0.10 180.00/hr	18.00
MT	Drafted correspondence to carrier/adjuster re: notification of the roof leak and inspection for two of the Gallery units [REDACTED]. L120 Analysis/Strategy	0.20 180.00/hr	36.00

		<u>Hrs/Rate</u>	<u>Amount</u>	
3/3/2022	MT	Review and analyzed and drafted correspondence to/from plaintiff Gallery's counsel re: emergency inspection, leaks in units 3104 and 3124, and reviewed attached photos of leak/inspection.	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
3/4/2022	MT	Drafted correspondence to adjuster re: K Hov's third supplemental disclosure statement and their new expert reports and cost of repair, our legal strategy in drafting and filing a motion to exclude as new opinions, and expectations.	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Drafted correspondence to client re: K [REDACTED]	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	SRG	Supplement and revise carrier correspondence regarding K.Hov untimely disclosure and revised expert report and cost of repair.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Client phone call regarding notice of additional emergency inspections and water intrusion [REDACTED]	0.30 195.00/hr	58.50
		L110 Fact Investigation/Development		
3/7/2022	MT	Review and analyzed correspondence from K Hov's counsel and Plaintiff's counsel re: withdrawal of filed motion for summary judgment.	0.10 180.00/hr	18.00
		L240 Dispositive Motions		
	SRG	Drafted corporate counsel response regarding communications with mediator and settlement negotiations.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed corporate counsel correspondence regarding settlement negotiations.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
3/8/2022	MT	Review and analyzed plaintiff and K Hov's stipulated motion to dismiss claims against one defendant, K Hov developments of arizona and proposed order.	0.30 180.00/hr	54.00
		L240 Dispositive Motions		

		<u>Hrs/Rate</u>	<u>Amount</u>	
3/8/2022	MT	Review and analyzed K. Hov's new, untimely expert reports, preliminary cost of repair, and subcontractor allocation report, in comparison to K. Hov's original timely expert reports, and preliminary cost of repair in preparation of drafting status report to carrier on new expert reports and motion to exclude.	0.80 180.00/hr	144.00
		L130 Experts/Consultants		
	MT	Drafted updated status report to carrier re: [REDACTED]	2.40 180.00/hr	432.00
		L120 Analysis/Strategy		
	SRG	Reviewed counsel correspondence regarding K.Hov withdrawing its pending Motion for Summary Judgment to determine impact on claims against client.	0.10 195.00/hr	19.50
		L150 Budgeting		
3/9/2022	MT	Drafted correspondence to client Renco re: [REDACTED]	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Drafted correspondence updated status report to the adjuster, Liz re: [REDACTED]	0.30 180.00/hr	54.00
		L120 Analysis/Strategy		
	MT	Teleconference with our expert MC Consultants to discuss [REDACTED]	0.30 180.00/hr	54.00
		L130 Experts/Consultants		
	MT	[TRAVEL TIME] travel time to/from (roundtrip) Project location, Gallery Townhomes in Scottsdale, AZ (18 miles total) [TRAVEL TIME].	0.90 180.00/hr	162.00
		L130 Experts/Consultants		
	MT	Drafted and revisions status report to carrier by drafting additions to liability and motion practice analysis sections, settlement/mediation analysis section, and civil procedure analysis section. Proofread expert findings' section with K Hov new reports.	1.00 180.00/hr	180.00
		L120 Analysis/Strategy		

		<u>Hrs/Rate</u>	<u>Amount</u>
3/9/2022 MT	Attended inspection at Project location Gallery Townhomes units 3124 and 3104 for emergency inspection of the roofs regarding leaks inside homes. Attended with expert MC Consultants.	2.20 180.00/hr	396.00
	L130 Experts/Consultants		
SRG	Reviewed and analyzed K.Hov's tenders for defense and indemnity to client to further analyze potential for motion for summary judgment on indemnity based on the discrepancy with which K.Hov entities it demands indemnity on behalf of.	0.20 195.00/hr	39.00
	L120 Analysis/Strategy		
SRG	Phone call to expert to discuss K.Hov's new untimely produced expert opinions, cost of repair, and allocation of fault. (9 pages)	0.20 195.00/hr	39.00
	L340 Expert Discovery		
SRG	Begin to analyze and outline potential motion for summary judgment on negligence and economic loss rule based on Arizona law. Requesting authority in next report to conduct legal research and to brief motion on this legal issue.	0.30 195.00/hr	58.50
	L240 Dispositive Motions		
SRG	Begin to analyze and outline potential motion for summary judgment on breach of implied warranty of workmanship and habitability based on Arizona law. Requesting authority in next report to conduct legal research and to brief motion on this legal issue.	0.30 195.00/hr	58.50
	L240 Dispositive Motions		
SRG	Begin to analyze and outline potential motion for summary judgment on contribution and (3) claims requesting declarative relief based on Arizona law. Requesting authority in next report to conduct legal research and to brief motion on this legal issue.	0.30 195.00/hr	58.50
	L240 Dispositive Motions		
SRG	Phone call with Mediator regarding case proceedings, global resolution efforts, and expert discovery dispute due to KHOV untimely reports and opinions.	0.30 195.00/hr	58.50
	L340 Expert Discovery		
SRG	Begin to analyze and outline potential motion for summary judgment on breach of express warranty based on Arizona law. Requesting authority in next report to conduct legal research and to brief motion on this legal issue.	0.40 195.00/hr	78.00
	L240 Dispositive Motions		

		<u>Hrs/Rate</u>	<u>Amount</u>
3/9/2022	SRG Begin to analyze and outline potential motion for summary judgment on express indemnity and breach of contract based on Arizona law. Requesting authority in next report to conduct legal research and to brief motion on contract and indemnity issues present in this case.	0.60 195.00/hr	117.00
	L240 Dispositive Motions		
	SRG Reviewed and analyzed K.Hov's disclosures related to project documents, specifically contracts, addendum, and other project documents to analyze potential defenses to contract based claims, including indemnity, warranty, breach of contract, to prepare outline of potential motions for summary judgment. (approximately 928 pages)	0.80 195.00/hr	156.00
	L310 Written Discovery		
3/10/2022	SRG Drafted K.Hov correspondence requesting it withdraw its new untimely reports and requesting meet and confer.	0.10 195.00/hr	19.50
	L210 Pleadings		
	SRG Phone call with adjuster regarding K.Hov untimely opinions [REDACTED]	0.20 195.00/hr	39.00
	L120 Analysis/Strategy		
	SRG Draft client correspondence outlining additional information and documents needed for disclosure and motions.	0.20 195.00/hr	39.00
	L310 Written Discovery		
	SRG Client phone call regarding legal [REDACTED]	0.50 195.00/hr	97.50
	L110 Fact Investigation/Development		
	SRG Phone call with Chad (expert) regarding cost of repair analysis and supplemental expert opinions. .5	0.50 195.00/hr	97.50
	L340 Expert Discovery		
	SRG Supplement and revise updated liability impact report regarding overall case proceedings but primarily [REDACTED]	1.70 195.00/hr	331.50
	L120 Analysis/Strategy		

			<u>Hrs/Rate</u>	<u>Amount</u>
3/11/2022	SRG	Drafted K.Hov meet and confer summary regarding Motion to Preclude expert opinions. L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG	Reviewed K.Hov correspondence regarding withdrawal of untimely reports. L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG	Phone call with client to further discuss [REDACTED] [REDACTED] L240 Dispositive Motions	0.40 195.00/hr	78.00
	SRG	Phone call to Amy Wilkens requesting withdrawal of expert reports and satisfying meet and confer requirement prior to filing motion to preclude the opinions. L340 Expert Discovery	0.40 195.00/hr	78.00
3/15/2022	MT	Review and analyzed court order granting stipulation re discovery deadlines. L120 Analysis/Strategy	0.10 180.00/hr	18.00
	MT	Review and analyzed K Hov's notice of withdrawal of motion for summary judgment without prejudice. L240 Dispositive Motions	0.10 180.00/hr	18.00
	SRG	Drafted adjuster correspondence regarding authority for motion to strike K.Hov reports. L210 Pleadings	0.10 195.00/hr	19.50
	SRG	Phone call to adjuster regarding Motion to Preclude K.Hov report. L210 Pleadings	0.10 195.00/hr	19.50
	SRG	Client phone call regarding Motion to Preclude expert opinions. L250 Other Written Motions and Submissions	0.20 195.00/hr	39.00
3/16/2022	MT	Review and analyzed K Hov's third supplemental disclosure in preparation of drafting joint motion to preclude K Hov's new expert reports. L350 Discovery Motions	0.30 180.00/hr	54.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/16/2022	MT	Began drafting joint motion to preclude K Hov's new expert reports as untimely by drafting introduction and factual background sections, among others. L350 Discovery Motions	0.70 180.00/hr 126.00
	SRG	Reviewed client email and update on project documents and payment records. L110 Fact Investigation/Development	0.10 195.00/hr 19.50
	SRG	Reviewed Order resetting Trial Setting Conference. L230 Court Mandated Conferences	0.10 195.00/hr 19.50
	SRG	Phone call to client regarding [REDACTED] [REDACTED] [REDACTED] L110 Fact Investigation/Development	0.30 195.00/hr 58.50
	SRG	Reviewed voluminous documents received from client, including payment records, job file records, and warranty/service requests. (approximately 20 attachments) L110 Fact Investigation/Development	0.60 195.00/hr 117.00
3/17/2022	MT	Review and analyzed court minute entry of placement of co-third-party Defendant Custom Leasing inc only on dismissal calendar unless stipulation filed. L120 Analysis/Strategy	0.10 180.00/hr 18.00
	MT	Review and analyzed and drafted correspondence to/from client regarding [REDACTED] [REDACTED] L110 Fact Investigation/Development	0.20 180.00/hr 36.00
	MT	Review and analyzed and drafted correspondence to/from plaintiff's counsel regarding request for product used on the roof (foam and coat and walk decks) and provided information of product. L110 Fact Investigation/Development	0.20 180.00/hr 36.00
	MT	Continued drafting joint motion to preclude K Hov's new expert reports as untimely and drafted additional factual background, introduction, and initial analysis of differences in the K. Hov's untimely reports. L350 Discovery Motions	1.20 180.00/hr 216.00

		<u>Hrs/Rate</u>	<u>Amount</u>
3/17/2022	SRG Phone call from Eric regarding [REDACTED] [REDACTED] [REDACTED]	0.40 195.00/hr	78.00
	L120 Analysis/Strategy		
3/18/2022	MT Teleconference with co-third-party defendant, Leblanc counsel to discuss whether they would like to join in our motion to preclude K. Hov's new expert opinions dated 2/25/2022 as untimely and prejudicial.	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
MT	Teleconference with co-third-party defendant, Chas Roberts A/C counsel to discuss whether they would like to join in our motion to preclude K. Hov's new expert opinions dated 2/25/2022 as untimely and prejudicial.	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
MT	Teleconference with co-third-party defendant, Gothic Landscaping counsel to discuss whether they would like to join in our motion to preclude K. Hov's new expert opinions dated 2/25/2022 as untimely and prejudicial.	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
MT	Teleconference with co-third-party defendant, Liberty Constructors counsel to discuss whether they would like to join in our motion to preclude K. Hov's new expert opinions dated 2/25/2022 as untimely and prejudicial.	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
MT	Teleconference with co-third-party defendant, Sargon Masonry Const counsel to discuss whether they would like to join in our motion to preclude K. Hov's new expert opinions dated 2/25/2022 as untimely and prejudicial.	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
MT	Drafted second supplemental disclosure statement to include and disclose additional documents produced by client, revised indemnity clause between the parties, additional defenses include lack of privity of contract, and additional payments made to client by K Hov.	0.60 180.00/hr	108.00
	L310 Written Discovery		
MT	Review and analyzed client's new documents provided including buildpro repair complete notifications, repair notifications, revised indemnity agreements between K Hov and client, and product information from client in preparation of drafting second supplemental disclosure to disclose.	0.80 180.00/hr	144.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L120 Analysis/Strategy		
3/18/2022	MT Drafted joint motion to preclude k hov new expert reports as untimely and prejudicial and drafted first part of expert report analysis and examples of new information.	1.00 180.00/hr	180.00
	L350 Discovery Motions		
	SRG Return call to Penny Manship (plaintiffs' counsel) regarding products used at project by Renco.	0.20 195.00/hr	39.00
	L110 Fact Investigation/Development		
3/21/2022	KM Draft 80(c) Verification for Second Supplemental Disclosure Statement	0.10 95.00/hr	9.50
	L250 Other Written Motions and Submissions		
	MT Made final revisions and proofread second supplemental disclosure statement disclosing additional documents and product information. Reviewed disclosed documents in agreements to ensure duplicates not disclosed.	0.50 180.00/hr	90.00
	L310 Written Discovery		
	SRG Drafted corporate counsel correspondence on Motion to Preclude and other potential motions.	0.10 195.00/hr	19.50
	L250 Other Written Motions and Submissions		
	SRG Reviewed and analyzed corporate counsel correspondence on Motion to Preclude K.Hov revised expert reports.	0.20 195.00/hr	39.00
	L250 Other Written Motions and Submissions		
	SRG Revise and supplement client's supplemental disclosure statement to include disclosure of new project documents, payment information, and theories of defense. 25 pages	0.30 195.00/hr	58.50
	L310 Written Discovery		
3/22/2022	MT Review and analyzed court order granting stipulated motion to dismiss claims against defendant K. Hov developments of Arizona ONLY.	0.10 180.00/hr	18.00
	L250 Other Written Motions and Submissions		
	MT Proofread and edited joint motion to preclude prior to finalizing.	0.40 180.00/hr	72.00
	L350 Discovery Motions		

		<u>Hrs/Rate</u>	<u>Amount</u>	
3/22/2022	MT	Drafted joint motion to preclude K Hov's new expert opinions, specifically new defense report, new cost of repair, and new subcontractor allocation summary, and specifically drafted the legal analysis sections to provide arguments that the reports are new opinions and untimely. Provided examples from each report of new opinions, and broke down each report into sections and each subcontractor analysis into sections. (total 20 pages).	3.80 180.00/hr	684.00
		L350 Discovery Motions		
	SRG	Drafted client and corporate counsel correspondence regarding [REDACTED]	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Reviewed and analyzed Eric (client) correspondence regarding [REDACTED].	0.10 195.00/hr	19.50
		L120 Analysis/Strategy		
	SRG	Begin drafting client's 3rd Supplemental Disclosure Statement to include factual background of legal claims, entities asserting legal claims and new legal theories of defense based on facts client is not under privity with the name third-party plaintiffs. (26 pages)	0.80 195.00/hr	156.00
		L310 Written Discovery		
3/23/2022	KM	Review file to identify relevant correspondence and redact for privileged information for inclusion in Second Supplemental Disclosure Statement (343 pages)	0.40 95.00/hr	38.00
		L210 Pleadings		
	MT	Review and analyzed and drafted correspondence to/from co-third-party defendant LeBlanc's counsel re: joining in motion to preclude K. Hov's expert opinions and how K Hov experts provided new information.	0.20 180.00/hr	36.00
		L350 Discovery Motions		
3/24/2022	MT	Teleconference with client Eric at Renco and client corporate counsel to [REDACTED].	0.50 180.00/hr	90.00
		L120 Analysis/Strategy		
	MT	Drafted and finalized joint motion to preclude K. Hov expert opinions as new untimely opinions, and included additional examples from the expert reports of new scope of repair and new repair protocols to fully support argument, added additional analysis of untimely new opinions, and bolstered the factual background to show that we explicitly objected to those new reports. Proofread and edited (21 pgs total).	1.80 180.00/hr	324.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L350 Discovery Motions		
3/24/2022	SRG Appear for attorney and corporate counsel meeting on future motion practice and strategy.	0.40 195.00/hr	78.00
	L240 Dispositive Motions		
3/25/2022	MT Teleconference with expert MC Consultants to discuss whether to disclose expert opinions now or after joint motion to preclude is ruled on. Discuss expert defense strategy.	0.30 180.00/hr	54.00
	L130 Experts/Consultants		
MT	Review and analyzed and revised joint motion to preclude K Hov's expert reports as new opinions and focused on the flow of the motion to ensure that court has concise strong arguments within the allotted page count in preparation of filing. Made revisions accordingly.	0.60 180.00/hr	108.00
	L350 Discovery Motions		
SRG	Drafted and revised client's mandatory rule 26.1 supplemental disclosure statement including additional legal theories of defense, affirmative defenses, non parties designated at fault. .7 18 pages	0.70 195.00/hr	136.50
	L310 Written Discovery		
SRG	Drafted, revised and supplemented Objection and Motion to Preclude Untimely Expert Opinions - including addition of case law and precedent in support of legal defense theories to preclude. With Adjuster Authority. 12 pages	2.30 195.00/hr	448.50
	L250 Other Written Motions and Submissions		
3/28/2022	SRG Phone call to expert regarding Motion to Preclude untimely opinions and request for information for further motion practice and oral argument.	0.10 195.00/hr	19.50
	L340 Expert Discovery		
SRG	Phone call and meet and confer with KHOV counsel regarding final demand to withdraw untimely expert reports or Motion to Preclude to be filed.	0.20 195.00/hr	39.00
	L160 Settlement/Non-Binding ADR		
MT	Review and analyzed K Hov's stipulated motion to continue on dismissal calendar as it relates to settlement with other third-party defendants, and proposed order.	0.20 180.00/hr	36.00
	L250 Other Written Motions and Submissions		

		<u>Hrs/Rate</u>	<u>Amount</u>	
3/28/2022	MT	Review and analyzed additional expert reports disclosed by other third-party defendants and K Hov in preparation of rebuttal reports with our experts.	0.50 180.00/hr	90.00
		L130 Experts/Consultants		
	MT	Review and analyzed similar case in rummel (city of Phoenix v. Pulte) regarding similar issue re untimely new expert opinions to include as persuasive authority in joint motion to preclude to show that same court/judge has ruled consistent on this issue. Drafted legal analysis of these findings in joint motion to preclude K Hov new expert opinions.	0.60 180.00/hr	108.00
		L350 Discovery Motions		
	RR	Draft portion of Motion for Summary Judgment to address prior similar rulings by court in City of Phoenix vs. Rummel case	0.70 195.00/hr	136.50
		L240 Dispositive Motions		
	SRG	Reviewed and analyzed correspondence and Stipulated Motion to Continue on Dismissal Calendar and Proposed Order filed with the Court today.	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Phone call from MC expert regarding expert discovery into material components and strategy for defense of claims.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
3/29/2022	SRG	Phone call to adjuster regarding filed Motion to Preclude and general briefing and impact.	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Phone call to client regarding filed Motion to Preclude and general briefing and impact.	0.20 195.00/hr	39.00
		L210 Pleadings		
	MT	Review and analyzed and drafted correspondence to/from plaintiff's counsel re: another emergency inspection, whether repairs will be conducted, and our expert attending in aid of defense and expert opinions.	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		
	MT	Drafted correspondence to adjuster Liz, regarding the upcoming emergency inspection to unit 3109, [REDACTED]	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		

		<u>Hrs/Rate</u>	<u>Amount</u>
3/29/2022	MT	Drafted correspondence to client, regarding the upcoming emergency inspection to unit 3109, roof [REDACTED] [REDACTED] L120 Analysis/Strategy	0.20 180.00/hr 36.00
	MT	Teleconference with expert to discuss emergency inspection [REDACTED] [REDACTED] L130 Experts/Consultants	0.30 180.00/hr 54.00
3/31/2022	SRG	Phone call from Penny (plaintiff's counsel) regarding further clarification of product manufacturers on products used at project necessary for proper repairs. L110 Fact Investigation/Development	0.30 195.00/hr 58.50
4/1/2022	MT	Drafted impact report to carrier regarding today's emergency inspection of unit 3109 at the Gallery Project [REDACTED] [REDACTED] L120 Analysis/Strategy	0.50 180.00/hr 90.00
	MT	[TRAVEL TIME] travel time to/from (roundtrip) the Gallery Project location in Scottsdale, AZ to conduct emergency inspection and repair for a roof leak in unit 3109 with expert MC Consultants (18 miles total). [TRAVEL TIME]. As approved in email by adjuster Kristin Childers dated 3/29. L120 Analysis/Strategy	0.80 180.00/hr 144.00
	MT	Attended emergency inspection at the Gallery Project location in Scottsdale, AZ to conduct inspection and repair for a roof leak in unit 3109 with expert MC Consultants. As approved in email by adjuster Kristin Childers dated 3/29. L120 Analysis/Strategy	1.60 180.00/hr 288.00
	SRG	Supplement carrier correspondence regarding today's emergency repair and request for authority for research on motions for summary judgment. L240 Dispositive Motions	0.10 195.00/hr 19.50
4/4/2022	MT	Review and analyzed court order re: stipulated motion to continue on dismissal calendar as to co-third-party defendant, Chas Roberts only. L250 Other Written Motions and Submissions	0.10 180.00/hr 18.00

		<u>Hrs/Rate</u>	<u>Amount</u>	
4/4/2022	MT	Review and analyzed K Hov's fourth supplemental disclosure statement. Reviewed the lay witnesses disclosed to determine if client requires supplement to disclosure.	0.30 180.00/hr	54.00
		L310 Written Discovery		
	MT	Review and analyzed plaintiff's lay witness disclosure statement. Reviewed the lay witnesses disclosed to determine if client requires supplement to disclosure.	0.40 180.00/hr	72.00
		L310 Written Discovery		
4/6/2022	MT	Review and analyzed the parties' stipulation for dismissal as to co-third-party defendant, Chas Roberts only and proposed order.	0.20 180.00/hr	36.00
		L250 Other Written Motions and Submissions		
4/7/2022	SRG	Drafted adjuster response regarding [REDACTED]	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Drafted KHOV Rule 408 Settlement communication.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed adjuster correspondence regarding new assigned adjuster and request for settlement information.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Phone call to corporate counsel regarding [REDACTED]	0.20 195.00/hr	39.00
		L160 Settlement/Non-Binding ADR		
	SRG	Phone call to Amy Wilkens counsel for K.Hov regarding settlement negotiations.	0.20 195.00/hr	39.00
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed file in preparation for responding to adjuster request for information on settlement negotiations.	0.20 195.00/hr	39.00
		L160 Settlement/Non-Binding ADR		
	SRG	Drafted Mediator Fleischman correspondence regarding anticipated Motion for Summary Judgment regarding Express Indemnity. (x3)	0.20 195.00/hr	39.00
		L240 Dispositive Motions		

			<u>Hrs/Rate</u>	<u>Amount</u>
4/7/2022	SRG	Phone call to Mediator Lawrence Fleischman regarding settlement negotiations. L160 Settlement/Non-Binding ADR	0.30 195.00/hr	58.50
4/8/2022	SRG	Phone call with mediator Fleischman continuing settlement negotiations and raising defenses and issues for future motion practice. L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	SRG	Phone call with Amy of K.Hov regarding continued settlement negotiations. L160 Settlement/Non-Binding ADR	0.30 195.00/hr	58.50
4/11/2022	SRG	Phone call with Judge Fleischman regarding settlement negotiations and impact of pending motions on settlement. (x3) L150 Budgeting	1.10 195.00/hr	214.50
	MT	Review and analyzed recent client disclosure statement, plaintiff's recent disclosure statement, K Hov's recent disclosure statement, and other parties' disclosure statements, and written discovery in preparation of drafting third supplemental disclosure statement disclosing additional lay witnesses, defenses, arguments, and related documents. L310 Written Discovery	0.60 180.00/hr	108.00
	MT	Drafted third supplemental disclosure statement disclosing additional lay witnesses, additional arguments and defenses, certain facts related to privity of contract, and relevant documents in preparation of motion practice. L310 Written Discovery	1.20 180.00/hr	216.00
4/13/2022	SRG	Reviewed and analyzed Order of Dismissal of Chas Roberts with prejudice. L250 Other Written Motions and Submissions	0.10 195.00/hr	19.50
	MT	Review and analyzed court order dismissing third-party defendant Chas Roberts A/C. L250 Other Written Motions and Submissions	0.10 180.00/hr	18.00
4/19/2022	MT	Review and analyzed K Hov's response to our motion to preclude and attachments in preparation of drafting reply in support of motion to preclude. L350 Discovery Motions	0.50 180.00/hr	90.00

			<u>Hrs/Rate</u>	<u>Amount</u>
4/22/2022	MT	Review and analyzed motion to preclude and k hov's response to motion to preclude to prepare to draft a reply in support of our motion to preclude. Took notes of counter arguments to address in reply.	0.80 180.00/hr	144.00
		L350 Discovery Motions		
	MT	Drafted reply in support of motion to preclude Khov's expert reports as new untimely opinions and addressed and rebutted Khov's arguments in its response (10 pgs total).	2.60 180.00/hr	468.00
		L350 Discovery Motions		
4/25/2022	SRG	Revise and supplement arguments within Reply to Motion to Preclude Untimely Expert Reports and Opinions. (12 pages)	2.10 195.00/hr	409.50
		L210 Pleadings		
	MT	Drafted reply in support of motion to preclude Khov's expert opinions as new and untimely opinions and made revisions to certain sections to bolster arguments and clean up factual basis for better court understanding. Added additional examples and analysis as well.	0.60 180.00/hr	108.00
		L350 Discovery Motions		
4/27/2022	MT	Review and analyzed and drafted and revised our reply in support of motion to preclude Khov's untimely new expert reports by conducting brief research on the case law to provide additional analysis on case cited by Khov to refute their arguments and cleaned up the reply in preparation of filing.	0.50 180.00/hr	90.00
		L350 Discovery Motions		
4/28/2022	TLO	Identify and prepare exhibits to Reply in Support of Motion to Preclude Untimely Reports and Opinions	0.10 95.00/hr	9.50
		L210 Pleadings		
	MT	Review and analyzed and drafted correspondence to/from plaintiff's counsel re: plaintiff's request for extension of plaintiff's expert reports only to monday instead of today, as strategy for our expert disclosure dispute with Khov.	0.20 180.00/hr	36.00
		L310 Written Discovery		
	MT	Review and analyzed relevant correspondence re: discovery disclosures between the parties (plaintiff and k hov) to support our reply iso of motion to preclude and to include in reply to further support our position.	0.30 180.00/hr	54.00
		L120 Analysis/Strategy		

		<u>Hrs/Rate</u>	<u>Amount</u>
4/29/2022	MT Review and analyzed stipulation to extend plaintiff's rebuttal expert reports and proposed order filed by plaintiff. L250 Other Written Motions and Submissions	0.20 180.00/hr	36.00
5/2/2022	MT Review and analyzed plaintiff Gallery's 13th Supplemental Disclosure Statement and exhibits (~80+ pgs) disclosing various expert rebuttal reports from SBSA, MC Consultants, PGG, Shelton Consulting Group, and Nautilus Building Consultants. L320 Document Production	1.00 180.00/hr	180.00
5/3/2022	MT Drafted correspondence to our expert, MC Consultants re: plaintiff's 13th supp disclosure and exhibits, including expert rebuttal reports to prepare for rebuttal expert opinions. L130 Experts/Consultants	0.20 180.00/hr	36.00
5/5/2022	MT Review and analyzed plaintiff and Khov's stipulated motion to continue on dismissal calendar and proposed order as it relates to the settling parties. L250 Other Written Motions and Submissions	0.20 180.00/hr	36.00
5/6/2022	SRG Drafted Court response to request for informaiton on pending motion to preclude KHov opinions. L210 Pleadings	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed D.Wilincek correspondence regarding oral argument and pending motion to preclude. L210 Pleadings	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed Court correspondence regarding oral argument on pending Motion to Preclude Khov's untimely opinions. L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed Khov response to Court request for information regarding oral argument on pending Motion to Preclude Khov's untimely opinions. L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed L.Fink correspondence regarding pending Motion to Preclude. L340 Expert Discovery	0.10 195.00/hr	19.50
	MT Review and analyzed plaintiff's six expert rebuttal reports from SBSA in preparation of drafting impact status report to carrier to provide analysis and details of impact rebuttal opinions will have on our client.	0.50 180.00/hr	90.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L120 Analysis/Strategy		
5/6/2022 MT	Drafted impact status report to carrier providing civil proceeding update and analysis. [REDACTED]	3.60 180.00/hr	648.00
	L120 Analysis/Strategy		
5/9/2022 SRG	Reviewed and analyzed Penny Manship correspondence regarding pending Motion to Preclude.	0.10 195.00/hr	19.50
	L210 Pleadings		
SRG	Reviewed and analyzed counsel A.Hough correspondence regarding pending Motion to Preclude and oral argument.	0.10 195.00/hr	19.50
	L210 Pleadings		
SRG	Reviewed and analyzed counsel T.Wales correspondence regarding pending Motion to Preclude and oral argument.	0.10 195.00/hr	19.50
	L210 Pleadings		
SRG	Reviewed and analyzed counsel S.Best correspondence regarding pending Motion to Preclude and oral argument.	0.10 195.00/hr	19.50
	L210 Pleadings		
SRG	Reviewed judicial assistant correspondence regarding oral argument on client's pending motion.	0.10 195.00/hr	19.50
	L240 Dispositive Motions		
SRG	Reviewed Liberty Constructors correspondence regarding pending Motion to Preclude.	0.10 195.00/hr	19.50
	L250 Other Written Motions and Submissions		
SRG	Reviewed counsel S.Best correspondence regarding pending Motion to Preclude.	0.10 195.00/hr	19.50
	L250 Other Written Motions and Submissions		
MT	Review and analyzed Court Order re: Stipulated Motion to Continue on Dismissal Calendar as to co-Third-Party Defendant Custom Leasing inc dba Home Builders.	0.10 180.00/hr	18.00
	L250 Other Written Motions and Submissions		

		<u>Hrs/Rate</u>	<u>Amount</u>	
5/9/2022	MT	Review and analyzed Court Order granting stipulation for extension of deadline for plaintiff's experts' rebuttal opinions.	0.10 180.00/hr	18.00
		L250 Other Written Motions and Submissions		
5/11/2022	SRG	Reviewed and analyzed correspondence from Plaintiff Penny Manship regarding pending Motion to Preclude.	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed and analyzed correspondence and Defendants/Third-Party Plaintiffs K. Hovnanian at Gallery, LLC, and K. Hovnanian Arizona Operations, LLC response to court regarding Motion to Preclude.	0.10 195.00/hr	19.50
		L240 Dispositive Motions		
5/12/2022	SRG	Drafted Judicial Assistant correspondence and response to request for information on pending Motion to Preclude file on behalf of client.	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed Judicial Assistant correspondence and request for information on pending Motion to Preclude file on behalf of client.	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed S.Best response to Court requested information on pending Motion to Preclude.	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed and analyzed khov response to judicial assistant request for information on pending motion to preclude.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
5/13/2022	MT	Teleconference with experts at MC Consultants to discuss plaintiff's recently disclosed rebuttal expert reports from their experts SBSA and Nautilus addressing other subs' expert reports and Khov's supp new expert reports [REDACTED].	0.60 180.00/hr	108.00
		L130 Experts/Consultants		
5/18/2022	MT	Review and analyzed court order re: oral argument for motion to preclude Khov's new untimely expert reports.	0.10 180.00/hr	18.00
		L350 Discovery Motions		
	MT	Drafted correspondence to adjuster Kristine re: [REDACTED]	0.30 180.00/hr	54.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L350 Discovery Motions		
5/20/2022	SRG Drafted Carter response regarding update on settlement.	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
	SRG Reviewed R.Carter correspondence regarding settlement.	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
	SRG Reviewed and analyzed SBSA Rebuttal Report to Nautilus opinions (3 pages) to determine impact on defenses/strategy; review relevant safety standards and instructions included in final report, in preparation for further communications with client/adjuster and overall expert discovery strategy. [REDACTED]	0.10 195.00/hr	19.50
	L340 Expert Discovery		
	SRG Reviewed and analyzed SBSA Rebuttal Report to BSC Forensic opinions (4 pages) to determine impact on defenses/strategy; review relevant safety standards and instructions included in final report, in preparation for further communications with client/adjuster and overall expert discovery strategy. [REDACTED]	0.20 195.00/hr	39.00
	L340 Expert Discovery		
	SRG Client phone call regarding case updated impact report and clarification on issues.	0.30 195.00/hr	58.50
	L110 Fact Investigation/Development		
	SRG Reviewed and analyzed SBSA Rebuttal Report to Shelton opinions (8 pages) to determine impact on defenses/strategy; review relevant safety standards and instructions included in final report, in preparation for further communications with client/adjuster and overall expert discovery strategy. [REDACTED]	0.30 195.00/hr	58.50
	L340 Expert Discovery		
	SRG Reviewed and analyzed SBSA Rebuttal Report to Peterson Geot. opinions (17 pages) to determine impact on defenses/strategy; review relevant safety standards and instructions included in final report, in preparation for further communications with client/adjuster and overall expert discovery strategy. [REDACTED]	0.40 195.00/hr	78.00
	L340 Expert Discovery		
	SRG Reviewed and analyzed SBSA Rebuttal Report to Renco opinions (6 pages) to determine impact on defenses/strategy; review relevant safety standards and instructions included in final report, in preparation for further communications with client/adjuster and overall expert discovery strategy. [REDACTED]	0.40 195.00/hr	78.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L340 Expert Discovery		
5/20/2022	SRG Reviewed and analyzed SBSA Rebuttal Report to Khov expert's opinions (36 pages) to determine impact on defenses/strategy; review relevant safety standards and instructions included in final report, in preparation for further communications with client/adjuster and overall expert discovery strategy. [REDACTED]	0.60 195.00/hr	117.00
	L340 Expert Discovery		
	SRG Revise and supplement client impact report, [REDACTED]	1.10 195.00/hr	214.50
	L120 Analysis/Strategy		
5/23/2022	SRG Reviewed carrier authority for mediation and discovery.	0.10 195.00/hr	19.50
	L120 Analysis/Strategy		
	SRG Drafted corporate counsel and client update on mediation and settlement demands.	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
	SRG Drafted client correspondence regarding deposition testimony.	0.10 195.00/hr	19.50
	L330 Depositions		
	SRG Reviewed A. Wilkens correspondence regarding client and expert testimony.	0.10 195.00/hr	19.50
	L330 Depositions		
	SRG Drafted carrier update regarding [REDACTED]	0.20 195.00/hr	39.00
	L160 Settlement/Non-Binding ADR		
	SRG Phone call to client regarding [REDACTED]	0.20 195.00/hr	39.00
	L330 Depositions		
	SRG Phone call to expert regarding expert discovery and testimony.	0.20 195.00/hr	39.00
	L340 Expert Discovery		
	SRG Phone call to Wilkens regarding clarification on mediation and discovery issues.	0.20 195.00/hr	39.00

		<u>Hrs/Rate</u>	<u>Amount</u>
L340 Expert Discovery			
5/23/2022	SRG Phone call to L.Fleischman regarding expert discovery, pending motion, and continued settlement negotiations. (x2)	0.30 195.00/hr	58.50
L160 Settlement/Non-Binding ADR			
5/24/2022	SRG Drafted A.Wilkens correspondence regarding depositions and mediation.	0.10 195.00/hr	19.50
L160 Settlement/Non-Binding ADR			
SRG	Drafted all counsel correspondence regarding discovery and mediation.	0.10 195.00/hr	19.50
L160 Settlement/Non-Binding ADR			
SRG	Phone call with Eric Lehti of Renco regarding [REDACTED]	0.50 195.00/hr	97.50
L110 Fact Investigation/Development			
5/25/2022	SRG Reviewed J.Boblick input on mediation and discovery issues.	0.10 195.00/hr	19.50
L110 Fact Investigation/Development			
SRG	Phone call with KHOV regarding mediation and ongoing discovery issues.	0.20 195.00/hr	39.00
L340 Expert Discovery			
5/27/2022	SRG Reviewed Penny Manship correspondence regarding mediation and trial setting conference.	0.10 195.00/hr	19.50
L160 Settlement/Non-Binding ADR			
SRG	Reviewed Amy Wilkens correspondence regarding oral argument on pending Motion to Preclude.	0.10 195.00/hr	19.50
L240 Dispositive Motions			
For professional services rendered		<u>75.70</u>	<u>\$14,035.50</u>
Additional Charges :			
		<u>Qty</u>	
3/25/2022	TLO Expense for professional services provided by MC Consultants, Invoice no. 67147 (approved by adjuster on 4/15/21)	1	283.50

Qty Amount

4/28/2022 TLO Court Filing Fee, Form Set #6763294

1 6.70

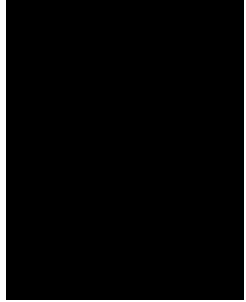
Total costs

\$290.20

Total amount of this bill

\$14,325.70

Previous balance



5/12/2022 Payment received from National Claims - thank you. Check No. 52131
 5/12/2022 Write off for invoice no. 51161

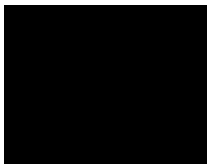
Total payments and adjustments

Balance due

Timekeeper Summary

Name	Hours	Rate	Amount
Rina Rai - Partner	0.70	195.00	\$136.50
Shannon Huff- Partner	30.00	195.00	\$5,850.00
Mohamad Tokko	44.40	180.00	\$7,992.00
Kristin Matysek	0.50	95.00	\$47.50
Tracy O'Brien - Paralegal	0.10	95.00	\$9.50

Total fees to date (inclusive of this bill)



Total costs to date (inclusive of this bill)

Rai Duer Huff P.C.

3033 North Central
Avenue, Suite 500
Phoenix, AZ 85012
Tax ID No.: 20-1799878

September 14, 2022

Invoice submitted to:

National Claims Service
Randall Langley Jr.

In Reference To: Case Name: Renco adv. K. Hovnarian
Project Name: The Gallery in Scottsdale
Claim Number: 46772
Date of Loss:
Cause Number: CV2020-008714
Attn: Randall Langley Jr.

Invoice # 52246

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>	
6/1/2022	SRG	Drafted K.Hov response to request for information.	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Reviewed K.Hov correspondence and request for information.	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Phone call with Amy Wilkens of KHOV regarding mediation and request for information on disclosed insurance information.	0.20 195.00/hr	39.00
		L160 Settlement/Non-Binding ADR		
6/2/2022	SRG	Drafted client response to request for information on case proceedings, mediation, and deposition testimony.	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Received KHOV correspondence regarding 2nd mediation and demand.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		

		<u>Hrs/Rate</u>	<u>Amount</u>
6/2/2022	SRG Reviewed adjuster correspondence re [REDACTED] [REDACTED] L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed client correspondence [REDACTED] [REDACTED] L110 Fact Investigation/Development	0.20 195.00/hr	39.00
	SRG Phone call from A.Wilkens regarding mediation and settlement authority. L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	SRG Drafted adjusters correspondence re [REDACTED] [REDACTED] L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	SRG Expert phone call regarding updates in [REDACTED] [REDACTED] L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	MT Review and analyzed previous pre-mediation report to carrier, updated analysis impact report, plaintiff and khov's most recent supplemental disclosure, and all expert reports including rebuttal reports from both plaintiff and khov in preparation of drafting updated pre-mediation report for second mediation as requested by carrier. L160 Settlement/Non-Binding ADR	1.30 180.00/hr	234.00
	MT Drafted second updated pre-mediation report to carrier as requested by adjuster in preparation of mediation, including [REDACTED] [REDACTED] [REDACTED] L160 Settlement/Non-Binding ADR	4.20 180.00/hr	756.00
6/3/2022	MT Review and analyzed and drafted correspondence to/from khov's counsel re: whether enough time is allotted for depositions if no settlement is reached at mediation. Discussed permission to sign and file stipulation and proposed order re: discovery. L120 Analysis/Strategy	0.20 180.00/hr	36.00
	MT Review and analyzed Khov's proposed stipulation to amend certain discovery dates and proposed order in preparation of granting permission to sign and file. Discussed minor revisions.	0.30 180.00/hr	54.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L250 Other Written Motions and Submissions		
6/7/2022	SRG	Phone call from Plaintiff regarding new emergency leaks and need for repairs.	0.30 195.00/hr	58.50
		L150 Budgeting		
	MT	Drafted correspondence to client re: emergency temporary roof repairs that will be conducted by plaintiff and the scope of those repairs.	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		
	MT	Drafted correspondence to adjuster kristin re: emergency temporary roof repairs that will be conducted by plaintiff and the scope of those repairs. Requested authority for me and expert to attend.	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Review and analyzed and drafted correspondence to/from Gallery's counsel regarding 4 new emergency inspections and repairs on 4 units with experts involved.	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Drafted correspondence to our expert at MC Consultants re: emergency temporary roof repairs that will be conducted by plaintiff and the scope of those repairs.	0.20 180.00/hr	36.00
		L130 Experts/Consultants		
6/8/2022	MT	Review and analyzed Motion to preclude Khov expert reports and responses/replies to issue spot arguments to be used at oral argument.	0.40 180.00/hr	72.00
		L350 Discovery Motions		
6/9/2022	SRG	Drafted outline of oral argument on Motion to Preclude.	1.10 195.00/hr	214.50
		L210 Pleadings		
	SRG	Reviewed Client's Motion to Preclude untimely expert reports, KHOv's Response, and client's Reply in preparation for oral argument.	2.10 195.00/hr	409.50
		L210 Pleadings		
6/10/2022	SRG	Drafted Judicial Assistant response to request for information and additional briefing.	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		

		<u>Hrs/Rate</u>	<u>Amount</u>
6/10/2022	SRG Reviewed Judicial Assistant correspondence and request for additional briefing on pending Motion to Preclude. L250 Other Written Motions and Submissions	0.10 195.00/hr	19.50
	SRG Phone call to expert regarding request for information as required by Judge Cooper for supplemental briefing on Motion to Preclude. L250 Other Written Motions and Submissions	0.30 195.00/hr	58.50
	SRG Reviewed and analyzed adjuster correspondence and attachments regarding emergency repairs and supporting expert invoices and expert reports. .4 L340 Expert Discovery	0.40 195.00/hr	78.00
	SRG Appear for oral argument on pending Motion to Preclude before Judge Cooper. L250 Other Written Motions and Submissions	0.50 195.00/hr	97.50
6/13/2022	SRG Client phone call regarding [REDACTED] [REDACTED]	0.20 195.00/hr	39.00
	L340 Expert Discovery		
	SRG Phone call to expert regarding production of expert job file. L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG Phone call from expert regarding Motion to Preclude and request for information needed for the Court's requested supplemental briefing on expert expenses. L340 Expert Discovery	0.30 195.00/hr	58.50
	SRG Analyze and develop strategy for supplemental briefing on Motion to Preclude Khov's opinions that add millions in damages to case. L340 Expert Discovery	0.40 195.00/hr	78.00
	MT [TRAVEL TIME] roundtrip travel to/from Gallery Project in Scottsdale, AZ to attend inspections and repairs of roofs on units 3124, 3112, 3104, 3019 (~18 miles roundtrip). L130 Experts/Consultants	0.80 180.00/hr	144.00
	MT Attended emergency repair inspection of units 3124, 3112, 3104, and 3109. At this inspection, Plaintiff Gallery and their expert Nautilus power-washed the roofs in preparation of repairs the following day. Attended with expert Chad at MC Consultants to determine impact repairs have on client implication and defense strategy. As approved by adjuster Kristin Childress in June 7, 2022 email. [TRAVEL TIME	6.20 180.00/hr	1,116.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	NOT INCLUDED].		
	L130 Experts/Consultants		
6/14/2022	SRG Reviewed notice of association of counsel for plaintiff - counsel Grace Osberg.	0.10 195.00/hr	19.50
	L250 Other Written Motions and Submissions		
	SRG Dated KHOV regarding requested expert discovery.	0.10 195.00/hr	19.50
	L340 Expert Discovery		
	SRG Analyze and develop strategy for supplemental briefing on Motion to Preclude Khov's opinions that add millions in damages to case.	0.20 195.00/hr	39.00
	L150 Budgeting		
	SRG Reviewed and analyzed settlement demand received from Khov to client.	0.30 195.00/hr	58.50
	L160 Settlement/Non-Binding ADR		
	SRG Revise and supplement pre-mediation report with update [REDACTED]	1.70 195.00/hr	331.50
	L120 Analysis/Strategy		
	MT Review and analyzed khov's new settlement demand in preparation of mediation and settlement authority.	0.20 180.00/hr	36.00
	L160 Settlement/Non-Binding ADR		
	MT Review and analyzed and drafted correspondence to/from client regarding [REDACTED].	0.30 180.00/hr	54.00
	L120 Analysis/Strategy		
	MT [TRAVEL TIME] roundtrip travel to/from Gallery Project in scottsdale, AZ to attend inspections and repairs of roofs on units 3124, 3112, 3104, 3019. (~18 miles roundtrip).	0.80 180.00/hr	144.00
	L130 Experts/Consultants		
	MT Attended emergency repair inspection of units 3124, 3112, 3104, and 3109. At this inspection, Plaintiff Gallery and their expert Nautilus conducted repairs on 3 of the 4 roofs (units 3124, 3112, 3104). Attended with expert Chad at MC Consultants to determine impact repairs have on client implication and defense strategy. As approved by adjuster Kristin Childress in June 7, 2022 email. [TRAVEL TIME	4.80 180.00/hr	864.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	NOT INCLUDED].		
	L130 Experts/Consultants		
6/15/2022	SRG Reviewed Fleischman correspondence regarding mandatory premeditation memo and requested content.	0.20 195.00/hr	39.00
	L110 Fact Investigation/Development		
MT	[TRAVEL TIME] roundtrip travel to/from Gallery Project in Scottsdale, AZ to attend inspections and repairs of roofs on units 3124, 3112, 3104, 3019. (~18 miles roundtrip).	0.80 180.00/hr	144.00
	L130 Experts/Consultants		
MT	Attended emergency repair inspection of units 3124, 3112, 3104, and 3109. At this inspection, Plaintiff Gallery and their expert Nautilus conducted repairs on final of the 4 roofs (unit 3109). Attended with expert Chad at MC Consultants to determine impact repairs have on client implication and defense strategy. As approved by adjuster Kristin Childress in June 7, 2022 email. [TRAVEL TIME NOT INCLUDED].	2.80 180.00/hr	504.00
	L130 Experts/Consultants		
6/16/2022	SRG Reviewed and analyzed correspondence, Stipulation to Dismiss Third-Party Defendant Gothic Landscaping, Inc. only, with Prejudice, and Order to determine impact on client.	0.20 195.00/hr	39.00
	L250 Other Written Motions and Submissions		
SRG	Phone call with Amy Wilkens regarding supplemental briefing and exchange of documents for supplementing as required by court order.	0.60 195.00/hr	117.00
	L250 Other Written Motions and Submissions		
MT	Review and analyzed Khov's stipulation to dismiss Gothic Landscaping only and proposed order.	0.10 180.00/hr	18.00
	L250 Other Written Motions and Submissions		
MT	Drafted the joint spreadsheet of expert findings as ordered by the court at oral argument in under advisement ruling on motion to preclude Khov's new expert reports. Included columns and rows of expert findings and how each subsection defect expert opinion changed in Khov's new reports.	0.80 180.00/hr	144.00
	L350 Discovery Motions		
MT	Review and analyzed pre-mediation report and previous status reports with summaries of expert findings and plaintiff, Khov, and client's expert reports in preparation of drafting the joint spreadsheet of expert findings as ordered by the court at oral argument in under advisement	0.80 180.00/hr	144.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	ruling on motion to preclude khov's new expert reports.		
	L350 Discovery Motions		
6/17/2022	SRG Reviewed and analyzed KHOV correspondence and request for information on supplemental briefing.	0.10 195.00/hr	19.50
	L210 Pleadings		
	SRG Phone call with MC Consultants regarding billing summary for Motion to Preclude and requested supplemental briefing.	0.20 195.00/hr	39.00
	L340 Expert Discovery		
	MT Drafted court ordered joint spreadsheet providing summary/details of expert findings as required in under advisement ruling on motion to preclude khov's new expert reports. Included columns and rows of expert findings and how each subsection defect expert opinion changed in khov's new reports. Ordered to provide plaintiff and client's expert findings as well to compare. As approved by adjuster in email dated 3.4.22 to file motion to preclude and ordered by the court to make ruling.	4.20 180.00/hr	756.00
	L350 Discovery Motions		
6/20/2022	SRG Drafted pleading for filing for supplemental briefing to extend filing date.	0.10 195.00/hr	19.50
	L210 Pleadings		
	SRG Drafted Plaintiff response regarding procedure and expert discovery and depositions.	0.10 195.00/hr	19.50
	L340 Expert Discovery		
	SRG Reviewed Plaintiff correspondence regarding procedure and expert discovery and depositions.	0.10 195.00/hr	19.50
	L340 Expert Discovery		
	SRG Phone call with Lou Horowitz regarding supplemental briefing. x2	0.30 195.00/hr	58.50
	L210 Pleadings		
	SRG Supplement and revise initial draft of Supplemental Briefing of spreadsheet of Plaintiff's initial report, supplemental report, KHOV initial report, supplemental report, and client's responsive sections. Voluminous document.	0.80 195.00/hr	156.00
	L210 Pleadings		

		<u>Hrs/Rate</u>	<u>Amount</u>
6/20/2022	MT	0.10 180.00/hr	18.00
	MT	0.10 180.00/hr	18.00
	MT	0.20 180.00/hr	36.00
	MT	1.00 180.00/hr	180.00
	MT	1.20 180.00/hr	216.00
6/21/2022	SRG	0.10 195.00/hr	19.50
	SRG	0.20 195.00/hr	39.00
6/23/2022	MT	0.50 180.00/hr	90.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/23/2022	MT Drafted supplemental briefs pursuant to the under advisement court ruling requiring spreadsheet and timeline, and made revisions to the timeline to incorporate Khov's lack of extension for its expert deadlines to support motion to preclude new opinions. Also drafted discovery list requested by court order to support the cost and time it will take to address KHOV'S new discovery and incorporated our expert's budget and time necessary. L350 Discovery Motions	1.20 180.00/hr	216.00
6/24/2022	SRG Pursuant to June 10 Court Order, Drafted supplemental briefing and Declaration of MC Consultants for Renco in support of Motion to Preclude. 8 pages plus exhibits L210 Pleadings	1.60 195.00/hr	312.00
	MT Review and analyzed pre-mediation report to carrier, previous mediation memo, plaintiff's expert reports and supp reports, Khov's expert reports and supp reports, and our client's expert reports in preparation of drafting second mediation memorandum to mediator. L160 Settlement/Non-Binding ADR	0.70 180.00/hr	126.00
	MT Drafted mediation memorandum to mediator and provided analysis for factual background, plaintiff, khov, and our client's experts' findings and opinions, alleged damages and cost of repair estimate analysis, legal claims and defenses analysis, settlement negotiations, and motion practice, in preparation of upcoming mediation (25 pgs total). L160 Settlement/Non-Binding ADR	4.20 180.00/hr	756.00
6/27/2022	SRG Reviewed adjuster correspondence regarding request for information and mediation. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG Supplement and revise Mediator Mediation Memo regarding legal theories of defense and analysis of actual construction defect claims implicating client and expert defenses to claims. [REDACTED] L160 Settlement/Non-Binding ADR	1.30 195.00/hr	253.50
	MT Drafted mediation memorandum and made final revisions including additional defense analysis of spoliation of evidence and plaintiff's failure to establish causation and failed repairs analysis, among others. L160 Settlement/Non-Binding ADR	0.50 180.00/hr	90.00
	MT Drafted supplemental briefs per under advisement ruling and made final revisions to include additional defect information in spreadsheet in preparation of ruling on motion to preclude.	1.00 180.00/hr	180.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L350 Discovery Motions		
6/28/2022	SRG	Reviewed and analyzed court order granting Order to Dismiss Third-Party Defendant Gothic Landscaping, Inc. only.	0.10 195.00/hr	19.50
		L150 Budgeting		
	SRG	Reviewed and analyzed Order regarding supplemental briefing on Motion to Preclude.	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Revise and supplement carrier premeditation correspondence and requested documents.	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Appear for pre-mediation conference with KHOV.	0.30 195.00/hr	58.50
		L160 Settlement/Non-Binding ADR		
	SRG	Appear for adjuster meeting to address [REDACTED]	0.50 195.00/hr	97.50
		L160 Settlement/Non-Binding ADR		
	SRG	Prepare for carrier liability analysis discussion for mediation and to get new adjuster familiar with file.	0.60 195.00/hr	117.00
		L160 Settlement/Non-Binding ADR		
	MT	Review and analyzed court order to dismiss third-party defendant gothic landscaping with prejudice.	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		
	MT	Review and analyzed court order re: extension of supplemental brief deadline in preparation of ruling on motion to preclude Khov expert reports.	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		
	MT	Review and analyzed and drafted correspondence to/from new adjuster Randall re [REDACTED]	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		

		<u>Hrs/Rate</u>	<u>Amount</u>
6/28/2022	MT	Review and analyzed the parties' stipulation to amend order re additional discovery while the parties participate in another mediation. L250 Other Written Motions and Submissions	0.20 180.00/hr 36.00
	MT	Drafted correspondence to khov's counsel re: court order for joint spreadsheet and timeline in preparation of ruling on motion to preclude. L350 Discovery Motions	0.30 180.00/hr 54.00
	MT	Drafted correspondence to adjuster Randall with requested information [REDACTED] [REDACTED] [REDACTED] L120 Analysis/Strategy	0.40 180.00/hr 72.00
	MT	Teleconference with new adjuster Randall to discuss status of case, [REDACTED] [REDACTED] L120 Analysis/Strategy	0.50 180.00/hr 90.00
	MT	Review and analyzed client and khov's disclosure statement and expert reports to determine information requested from new adjuster randall including expert analysis and extent of alleged defects. L120 Analysis/Strategy	0.60 180.00/hr 108.00
	MT	Drafted affidavit for expert re: additional discovery and costs associated with Khov's new expert reports as required and ordered by the court under advisement ruling in order to make ruling on motion to preclude Khov's new expert reports. L350 Discovery Motions	1.00 180.00/hr 180.00
	MT	Teleconference with experts MC Consultants to discuss lab testing issue of gypcrete firm fill from tempo at mcclintock and discussed strategy in expert disclosures to support our claims against Hacker and prove our case. L130 Experts/Consultants	1.10 180.00/hr 198.00
6/29/2022	SRG	Drafted adjuster Randall correspondence responsive to request for information regarding work [REDACTED] [REDACTED] L110 Fact Investigation/Development	0.20 195.00/hr 39.00
	SRG	Client phone call to provide information responsive to adjuster Randall request for information.	0.30 195.00/hr 58.50

		<u>Hrs/Rate</u>	<u>Amount</u>
	L110 Fact Investigation/Development		
6/29/2022	MT Drafted attachment to affidavit for our client's expert MC Consultants to include information to support affidavit and supplemental briefing as ordered by the court under advisement ruling in preparation of ruling on our motion to preclude khov's untimely expert reports.	0.70 180.00/hr	126.00
	L350 Discovery Motions		
6/30/2022	SRG Drafted R.Langley response to request for pre-mediation information and liability discussion.	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
SRG	Reviewed and analyzed R.Langley correspondence and request for information.	0.10 195.00/hr	19.50
	L250 Other Written Motions and Submissions		
SRG	Phone call to Lou of KHOV regarding status of supplemental briefing on motion to preclude as required by court.	0.20 195.00/hr	39.00
	L210 Pleadings		
MT	Review and analyzed and drafted correspondence to/from adjuster randall re: [REDACTED].	0.20 180.00/hr	36.00
	L160 Settlement/Non-Binding ADR		
MT	Review and analyzed expert photos to determine [REDACTED] as requested by new adjuster in preparation of mediation.	0.40 180.00/hr	72.00
	L120 Analysis/Strategy		
MT	Teleconference with adjuster Randall to discuss question [REDACTED].	0.50 180.00/hr	90.00
	L120 Analysis/Strategy		
7/1/2022	SRG Review and analyzed Khov's revisions and redlines to the supplemental briefs ordered by the court in under advisement ruling to make ruling on motion to preclude khov new expert opinions and reviewed the spreadsheet and timeline and analyzed whether to accept or deny and make other changes.	1.10 195.00/hr	214.50
	L340 Expert Discovery		
7/5/2022	SRG Reviewed and analyzed Court Order regarding modified scheduling order.	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L250 Other Written Motions and Submissions		
7/6/2022	SRG	Phone call with Chad (expert) regarding mediation and defense strategy.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	MM	Review and analyze Plaintiff's 14th supp and newly disclosed documents re roof repairs to evaluate impact on case and in preparation for Mediation. (273 pages)	1.30 180.00/hr	234.00
		L210 Pleadings		
7/8/2022	SRG	Reviewed Court Order regarding trial setting conference..1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Phone call with Mike Ludwig regarding general mediation and subcontractor defense strategy and case information as we're the remaining third-party defendants mediating on Monday..3	0.30 195.00/hr	58.50
		L160 Settlement/Non-Binding ADR		
	SRG	Phone call with L.Horowitz regarding mediation and other case proceedings to assist with settlement.	0.60 195.00/hr	117.00
		L340 Expert Discovery		
	SRG	Client phone call with Eric regarding [REDACTED]	1.10 195.00/hr	214.50
		L110 Fact Investigation/Development		
	MM	Draft correspondence to adjuster, Randall Langley, re mediation and settlement authority	0.10 180.00/hr	18.00
		L160 Settlement/Non-Binding ADR		
	MM	Continue reviewing and analyzing documents including disclosures, expert reports, cost of repair reports, and pending motions re exclusion of cost of repair, in preparation for mediation. (314 pages, With Randall Langley's authority)	1.20 180.00/hr	216.00
		L160 Settlement/Non-Binding ADR		
	MM	Review and analyze disclosed documents in plaintiffs 14th supp disclosure, including roof repair documents, photographs, and field notes to evaluate impact on case and liability exposure of Renco. (341 pages)	1.70 180.00/hr	306.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L110 Fact Investigation/Development		
7/10/2022	MM Review and analyze pleadings of parties, disclosures, voluminous expert reports from plaintiff, Khov, and Renco, pending motions, cost of repair and mediation statements in preparation for mediation with Khov to seek resolution of matter. (817 pages, w/ Randall Langley's authority)	4.60 180.00/hr	828.00
	L160 Settlement/Non-Binding ADR		
7/11/2022	MM Premediation conference call with adjuster Randall Langley to discuss [REDACTED]	0.30 180.00/hr	54.00
	L160 Settlement/Non-Binding ADR		
	MM Appear on behalf of Recno Roofing for Mediation with Hon. Larry Fleischman, in order to participate in good faith settlement negotiation to resolve matter. (with Randall Langley's authority)	7.90 180.00/hr	1,422.00
	L160 Settlement/Non-Binding ADR		
7/12/2022	RR Draft portion of post mediation report to include updated conference with mediator and proposal,	0.40 195.00/hr	78.00
	L120 Analysis/Strategy		
7/13/2022	MT Review and analyzed correspondence from client Eric [REDACTED]	0.70 180.00/hr	126.00
	L110 Fact Investigation/Development		
	SRG Phone call with Mediator Fleischman regarding continued settlement negotiations.	0.40 195.00/hr	78.00
	L160 Settlement/Non-Binding ADR		
	MM Review and analyze documents, including reports, correspondences, and disclosures for drafting updated status report. (118 pages)	0.70 180.00/hr	126.00
	L130 Experts/Consultants		
	MM Draft updated status report re status of July 11 Mediation, [REDACTED]	2.70 180.00/hr	486.00
	L110 Fact Investigation/Development		
7/14/2022	MM Review and analyze docs for updated status report to client and corporate counsel (115 pages)	0.40 180.00/hr	72.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L110 Fact Investigation/Development		
7/14/2022	MM Draft updated status report to client, Eric Lahti, and corporate counsel, re status of case, [REDACTED]	1.80 180.00/hr	324.00
	L110 Fact Investigation/Development		
7/15/2022	SRG Phone call from Plaintiff's counsel regarding extensive ongoing discovery, expert discovery and other issues for further handling of defense.	0.30 195.00/hr	58.50
	L340 Expert Discovery		
	SRG Revise and supplement post mediation carrier and client report including [REDACTED]	0.60 195.00/hr	117.00
	L160 Settlement/Non-Binding ADR		
7/18/2022	MM Draft correspondence to expert, MC consultants, re status of case, and expert discovery and job files.	0.10 180.00/hr	18.00
	L130 Experts/Consultants		
	MM Review and analyze correspondence from expert, MC consultants, re status of case, and expert discovery and job files.	0.10 180.00/hr	18.00
	L130 Experts/Consultants		
7/20/2022	SRG Phone call to Lou to continue creative settlement proposal discussed at mediation.	0.20 195.00/hr	39.00
	L160 Settlement/Non-Binding ADR		
7/21/2022	SRG Phone call from P.Frame (corporate counsel) regarding defense plan and strategy for settlement.	0.30 195.00/hr	58.50
	L160 Settlement/Non-Binding ADR		
	SRG Phone call with Eric Lehti to discuss settlement status and upcoming deposition and preparation for testimony.	0.60 195.00/hr	117.00
	L110 Fact Investigation/Development		
	SRG Drafted and revise client and corporate counsel response and update [REDACTED]	0.60 195.00/hr	117.00
	L160 Settlement/Non-Binding ADR		

			<u>Hrs/Rate</u>	<u>Amount</u>
7/21/2022	MM	Review and analyze correspondence from Renco corporate counsel, Rick Carter, re [REDACTED] [REDACTED]	0.10 180.00/hr	18.00
		L110 Fact Investigation/Development		
	MM	Continue drafting post-mediation status report to client [REDACTED] [REDACTED]	0.40 180.00/hr	72.00
		L160 Settlement/Non-Binding ADR		
7/22/2022	SRG	Phone call from MC Consultants regarding expert discovery and deposition testimony.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	MM	Draft correspondence to Renco corporate counsel, Rick Carter, re [REDACTED] [REDACTED]	0.10 180.00/hr	18.00
		L110 Fact Investigation/Development		
7/25/2022	SRG	Phone call from KHOV counsel Leslie requesting information on PMK testimony for expert discovery.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	SRG	Phone call with expert (MC) regarding mandatory production of job file for disclosure and expert discovery and deposition testimony.	0.30 195.00/hr	58.50
		L340 Expert Discovery		
	MM	Review and analyze docs in prep for conference call with Khov's counsel, Lou Horowitz,	0.30 180.00/hr	54.00
		L110 Fact Investigation/Development		
	MM	Review and analyze documents provided by client, Eric Lahti, re [REDACTED] [REDACTED]	0.60 180.00/hr	108.00
		L110 Fact Investigation/Development		
	MM	Telephone conference w/ Khov's counsel, Lou Horowitz, re status of case, settlement negotiation, discussion of joint expert defense, and expert discovery.	0.60 180.00/hr	108.00
		L160 Settlement/Non-Binding ADR		
7/26/2022	SRG	Phone call from expert at MC Consultants regarding overall case strategy and developments, expert discovery, and past investigation and preliminary findings.	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L340 Expert Discovery		
7/27/2022	MM	Review and analyze documents in prep for drafting supp disclosure.	0.40 180.00/hr	72.00
		L210 Pleadings		
7/28/2022	MM	Draft supp disclosure statement to ensure all affirmative defenses are included including extrapolation and spoliation. (28 pages)	1.20 180.00/hr	216.00
		L210 Pleadings		
	RR	analyze possible extrapolation defense motion	0.50 195.00/hr	97.50
		L240 Dispositive Motions		
7/29/2022	MM	Draft correspondence to adjuster, Randall L., re [REDACTED]	0.10 180.00/hr	18.00
		L130 Experts/Consultants		
	MM	Review and analyze comprehensive topics of 30(b)(6) examination for deposition of representative of Renco, in order to evaluate topics for appropriate objections.	0.10 180.00/hr	18.00
		L330 Depositions		
	MM	Telephone conference to adjuster, Randall L., re status of experts, disclosure, and issues with disclosing job file per court order.	0.20 180.00/hr	36.00
		L130 Experts/Consultants		
8/1/2022	MM	Draft correspondence to adjuster, Randall, Lagnley, re status of case, disclosure of expert job file and related expenses.	0.10 180.00/hr	18.00
		L110 Fact Investigation/Development		
	MM	Review and analyze correspondence from adjuster, Randall, Lagnley, re status of case, disclosure of expert job file and related expenses.	0.10 180.00/hr	18.00
		L110 Fact Investigation/Development		
	SRG	Reviewed correspondence from Plaintiffs requesting wide-range of discovery issues and topics for discussion and to prepare objections under Rules of Civil Procedure.	0.20 195.00/hr	39.00
		L330 Depositions		
8/2/2022	SRG	Drafted Plaintiff response to inquiry on expert discovery and production of expert job files.	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L340 Expert Discovery		
8/2/2022	SRG	Reviewed and analyzed Plaintiffs counsel correspondence regarding expert discovery and production of expert documents.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Phone call to corporate counsel regarding Order granting Motion to Preclude KHOV's untimely and prejudicial opinions and impact on client.	0.20 195.00/hr	39.00
		L210 Pleadings		
	SRG	Supplement and revise 3rd Supplemental Disclosure Statement with information required by Order regarding expert discovery.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	SRG	Phone call to corporate counsel regarding favorable ruling on Motion to Preclude and impact on defense/strategy.	0.40 195.00/hr	78.00
		L120 Analysis/Strategy		
8/3/2022	MM	Review and analyze correspondence from Khov's counsel Leslie Harrach, re status of case, and comprehensive landscape of upcoming discovery and depositions.	0.10 180.00/hr	18.00
		L110 Fact Investigation/Development		
	SRG	Drafted corporate counsel and client correspondence with ruling from court granting Motion to Preclude [REDACTED]	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Drafted adjuster correspondence regarding rulling on motion to preclude, [REDACTED].	0.20 195.00/hr	39.00
		L210 Pleadings		
8/8/2022	MM	Review and analyze correspondence from Plaintiff's counsel, Grace Osberg, re status of case, expert discovery and expert depositions.	0.10 180.00/hr	18.00
		L110 Fact Investigation/Development		
	SRG	Drafted client and corporate counsel regarding anticipated continued discovery and identification of 30B6 witnesses and objections based on case status.	0.10 195.00/hr	19.50
		L340 Expert Discovery		

			<u>Hrs/Rate</u>	<u>Amount</u>
8/8/2022	SRG	Phone call from Homeowners' counsel regarding expert discovery and identification of 30B6 witnesses. L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG	Phone call to expert regarding requested deposition testimony and discovery generally. L340 Expert Discovery	0.20 195.00/hr	39.00
8/9/2022	MM	Review and analyze Plaintiff's 15th supplemental disclosure statement to evaluate new theories of claims, position on case, new evidence and witnesses to evaluate impact on case. L210 Pleadings	0.20 180.00/hr	36.00
	MM	Review and analyze newly disclosed project documents by Plaintiff, including repair photographs, field notes, invoices, and expert materials in order to evaluate impact on case and defense of Renco Roofing (210 pages) L110 Fact Investigation/Development	0.70 180.00/hr	126.00
	SRG	Phone call from Rick Carter to discuss requested 30B6 deposition topics [REDACTED] L310 Written Discovery	0.30 195.00/hr	58.50
	SRG	Prepare for deposition of Robert Van Der Waal, the Person Most Knowledgeable representative from HOA Association with authority from adjuster. L330 Depositions	1.20 195.00/hr	234.00
8/10/2022	SRG	Reviewed M.Ludwig correspondence regarding HOA representative and anticipated deposition testimony. L330 Depositions	0.10 195.00/hr	19.50
	SRG	Phone call with Mike Ludwig regarding general case status, collective defense strategy and anticipated deposition testimony. L120 Analysis/Strategy	0.20 195.00/hr	39.00
	SRG	Appear for deposition of Homeowners' Association Representative of Robert Van Der Waal. L330 Depositions	1.60 195.00/hr	312.00
8/11/2022	MM	Draft correspondences to expert witness, Chad Polvika, re additional disclosure statements of plaintiff, and new documents including expert memorandums, to ensure expert's job file is complete for deposition	0.10 180.00/hr	18.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	and trial.		
	L130 Experts/Consultants		
8/11/2022	MM Draft correspondence to Renco's corporate counsel, Rick Carter, re [REDACTED]	0.20 180.00/hr	36.00
	L110 Fact Investigation/Development		
	MM Review and analyze correspondence from Renco's corporate counsel, Rick Carter, re [REDACTED]	0.20 180.00/hr	36.00
	L110 Fact Investigation/Development		
	MM Review and analyze Plaintiff's comprehensive 16th supplemental disclosure statement, to evaluate supplements to claims, theories, witnesses, evidence, and experts to evaluate impact on case and defense of Renco. (31 pages).	0.20 180.00/hr	36.00
	L210 Pleadings		
	MM Telephone conference w/ Khov's counsel, Leslie Harrach, re status of case, discovery, depositions of 30(b)(6) representatives and experts, and willingness to continue settlement negotiations.	0.30 180.00/hr	54.00
	L110 Fact Investigation/Development		
	MM Telephone conference to expert, Chad Polvika, re status of case, discussion of defects, and deposition.	0.30 180.00/hr	54.00
	L130 Experts/Consultants		
	MM Review and analyze newly disclosed documents by Plaintiff, including updated expert memorandum, CV and credentials, materials and references for claims and expert opinions, and billing and damages, to evaluate whether late disclosure objection is necessary and impact on case and defense of insured. (82 pages)	0.40 180.00/hr	72.00
	L110 Fact Investigation/Development		
	SRG Phone call with expert regarding new expert documents disclosed today and impact on claims/defenses.	0.20 195.00/hr	39.00
	L340 Expert Discovery		
8/12/2022	MM Review and analyze Liberty Constructors' 3rd Supplemental Disclosure Statement, to evaluate amended theories on case, defenses, witnesses and scope of testimony, and evidence to evaluate impact on case and defense of Renco.	0.20 180.00/hr	36.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L210 Pleadings		
8/12/2022	MM Call to expert Chad Polvika re status of case, mediation status, defenses to defect allegations, and discussion of expert depositions.	0.30 180.00/hr	54.00
	L130 Experts/Consultants		
	MM Appear for party wide telephone conference re discussion of status of case, outcome of mediation, and expert discovery.	0.40 180.00/hr	72.00
	L110 Fact Investigation/Development		
	MM Review and analyze documents, including pleadings, court orders and minute entries in preparation to attend all party conference call (89 pages)	0.40 180.00/hr	72.00
	L110 Fact Investigation/Development		
	MM Review and analyze new documents disclosed by third party defendant Liberty Constructions, including photographs, contracts, work agreements, and reports, in order to evaluate impact on case and defense of Renco. (392 pages)	0.60 180.00/hr	108.00
	L110 Fact Investigation/Development		
8/17/2022	MM to corporate counsel, Richard Carter, re Renco's 30(b)(6) representative for disclosure and deposition.	0.10 180.00/hr	18.00
	L110 Fact Investigation/Development		
	MM Draft correspondence to corporate counsel, Rick Carter, re identity of 30(b)(6) for Renco, [REDACTED].	0.10 180.00/hr	18.00
	L110 Fact Investigation/Development		
	MM Review and analyze correspondence from corporate counsel, Rick Carter, re identify of Renco's new 30(b)(6) rep [REDACTED].	0.10 180.00/hr	18.00
	L110 Fact Investigation/Development		
	MM Review and analyze correspondence from Khov's counsel, Leslie Harrach, re identify and disclosure of Renco's 30(b)(6) representative.	0.10 180.00/hr	18.00
	L110 Fact Investigation/Development		
	MM Review and analyze correspondence from corporate counsel, Rick Carter, re identity of 30(b)(6) for Renco [REDACTED].	0.10 180.00/hr	18.00
	L110 Fact Investigation/Development		

		<u>Hrs/Rate</u>	<u>Amount</u>
8/17/2022	MM Review and analyze notice of 30(b)(6) deposition of Khov's at Gallery, LLC representative, including scope of examination and topics, in order to adequately prepare for deposition. (9 pages)	0.20 180.00/hr	36.00
	L330 Depositions		
	MM Telephone conference to corporate counsel, Richard Carter, re Renco's 30(b)(6) representative for disclosure and deposition.	0.30 180.00/hr	54.00
	L110 Fact Investigation/Development		
8/18/2022	MM Telephone conference w/ Khov's counsel, Leslie Harrach, re status of case, 30(b)(6) depositions, and settlement negotiations.	0.20 180.00/hr	36.00
	L110 Fact Investigation/Development		
8/19/2022	MM Review and analyze Khov's expert allocation report by Bert Howe, in order to evaluate contents of report and scope of allocation and causation, to prepare for upcoming depositions and potential motion for summary judgment.	0.20 180.00/hr	36.00
	L130 Experts/Consultants		
	MM Review and analyze Plaintiff's expert reports by SBSA, in order to evaluate whether report and expert opine on allocation of responsibility for each defect by the subcontractors, in order to evaluate viability of motion for summary judgment on lack of causation. (2 reports, 243 pages).	0.50 180.00/hr	90.00
	L130 Experts/Consultants		
	MM Review and analyze all GC KHov's disclosure statements to identify disclosed documents in preparation of upcoming voluminous party and expert depositions. (293 pages).	0.60 180.00/hr	108.00
	L210 Pleadings		
	MM Review and analyze all plaintiff's disclosure statements to identify disclosed documents in preparation of upcoming voluminous party and expert depositions. (348 pages).	0.70 180.00/hr	126.00
	L210 Pleadings		
8/21/2022	MM Review and analyze Renco's expert report by MC Consultants in order to evaluate whether scope of allocation of fault to Renco was included, in order to investigate viability of motion for summary judgment against Khov	0.40 180.00/hr	72.00
	L130 Experts/Consultants		
	MM Review and analyze documents, including disclosures, pleadings, correspondences, and motions, in preparation to draft supplemental disclosure statement for Renco. (192 pages)	0.40 180.00/hr	72.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L210 Pleadings		
8/21/2022	MM Draft 4th supplemental disclosure to include further pertinent affirmative defenses, witnesses and scope of testimony, and tangible evidence to ensure they are preserved for trial.	0.60 180.00/hr	108.00
	L210 Pleadings		
	MM Review job file of SBSA in preparation for deposition of Plaintiff's standard of care expert, Ed Fronapfel, in order to identify applicable exhibits and documents to present at deposition to further defense of Renco. (652 pages).	2.10 180.00/hr	378.00
	L130 Experts/Consultants		
8/22/2022	MM Draft correspondence to Renco's corporate counsel, Rick Carter, re identity of Renco's 30(b)(6) [REDACTED]	0.10 180.00/hr	18.00
	L110 Fact Investigation/Development		
	MM Draft correspondence to expert, Chad P., re status of case, expert depositions, report, and strategy in order to prepare for his expert deposition.	0.10 180.00/hr	18.00
	L130 Experts/Consultants		
	MM Draft correspondence to expert, Chad P., re status of case, and notice of deposition.	0.10 180.00/hr	18.00
	L130 Experts/Consultants		
	MM (2)Review and analyze correspondence from Renco's corporate counsel, Rick Carter, re identity of Renco's 30(b)(6) and scope of testimony. (2 emails)	0.20 180.00/hr	36.00
	L110 Fact Investigation/Development		
	MM Review and analyze Plaintiff's 17th supplemental disclosure statement to evaluate any new theories and claims, witnesses, evidence, or damages, in order to evaluate impact on case and defense of Renco Roofing. (32 pages).	0.20 180.00/hr	36.00
	L210 Pleadings		
	MM Telephone conference to expert, Chad P., re status of case, expert depositions, report, and strategy in order to prepare for his expert deposition.	0.30 180.00/hr	54.00
	L130 Experts/Consultants		

		<u>Hrs/Rate</u>	<u>Amount</u>
8/22/2022	MM Review and analyze supplements to Plaintiff's expert job file for SBSA, and documents disclosed with Plaintiff's 17th supplemental disclosure, in order to evaluate documents, expert photos, and field notes to evaluate impact on defense of insured and to prepare for depositions. (62 pages) L210 Pleadings	0.30 180.00/hr	54.00
	MM Review and analyze documents disclosed by Plaintiff in preparation of expert depositions of Plaintiff's experts Ed Fronapfel and stefan G., and Khov's expert, terry Ingo, in order to identify pertinent documents and photographs to use as exhibits to bolster defense of Renco (>5,000 pages) L130 Experts/Consultants	2.40 180.00/hr	432.00
	RR prepare for deposition of plaintiffs standard of care expert Ed. Fronapfel including review of expert reports, rebuttal and responses and portions of job file L330 Depositions	2.80 195.00/hr	546.00
8/23/2022	MM Review and analyze job file of Plaintiff's cost of repair expert and temporary repair provider, Stefan G., of Nautilus Construction, in order to identify pertinent documents in preparation for expert deposition of Stefan of Nautilus in order to defend insured Renco Roofing. (817 pages). L130 Experts/Consultants	1.80 180.00/hr	324.00
	RR Attend deposition of plaintiffs standard of care expert Ed Fronapfel L330 Depositions	2.00 195.00/hr	390.00
	RR Prepare for deposition of plaintiff expert S. Gustophson (cost of repair) including review of documents identified by M. McGillivray L330 Depositions	1.50 195.00/hr	292.50
8/24/2022	MM Draft correspondence to corporate counsel, Rick Carter, re deposition of Renco 30(b)(6) Jeff Nickerson and scope of examination. L330 Depositions	0.10 180.00/hr	18.00
	MM Review and analyze expert report by Khov's expert, Bert Howe, in order to evaluate report for allocation of fault, or specific identification of each subcontractor's scope of work, to evaluate whether the report lacks causation in preparation to evaluation appropriateness of motion for summary judgment re lack of causation against Renco. (32 pages). L130 Experts/Consultants	0.20 180.00/hr	36.00

		<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2022	MM Review and analyze notice of 30(b)(6) deposition of client Jeff Nickerson, [REDACTED] [REDACTED]. L330 Depositions	0.20 180.00/hr	36.00
	MM Review and analyze expert report by Renco's expert, Chad Polivka in order to evaluate report for allocation of fault, or specific identification of each subcontractor's scope of work, to evaluate whether the report lacks causation in preparation to evaluation appropriateness of motion for summary judgment re lack of causation against Renco. (32 pages) L130 Experts/Consultants	0.30 180.00/hr	54.00
	RR attend/take deposition of S. Gustatson, plaintiff's cost of repair expert L330 Depositions	1.70 195.00/hr	331.50
	RR Review and analyze and draft correspondents to M. Barret re: settlement authority (x4) L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	RR expert telephone conference with L. Horowitz re: motions and settlement strategy L160 Settlement/Non-Binding ADR	0.40 195.00/hr	78.00
	RR telephone conference with L. Horowitz, counsel for Khov re: case procedural status, motions and settlement L120 Analysis/Strategy	0.70 195.00/hr	136.50
8/25/2022	MM Review disclosures for Khov's specifications as requested by corporate counsel in preparation for deposition of renco's 30(b)(6) and expert witness. L110 Fact Investigation/Development	0.40 180.00/hr	72.00
	MM Review and analyze documents in prep for final supp disclosure, including recent document disclosed by Plaintiff and Khov, to ensure all defenses and theories of case that are applicable to Renco's defenses are raised and preserved. L210 Pleadings	0.60 180.00/hr	108.00
	MM Review and analyze documents in preparation deposition of Khov's expert, curt peterson, including comprehensive job file, with photographs and field notes, expert report, and rebuttal report by Plaintiff, and other references relied on by Mr. Peterson, in order to use helpful exhibits and in preparation for deposition. (1,318 pages).	1.90 180.00/hr	342.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L330 Depositions		
8/25/2022	MM Begin drafting final supp disclosure in order to ensure all affirmative defenses are raised and expanded, including, lack of causation ,damages, extrapolation, and other defenses to preserve them for trial. (34 pages).	2.30 180.00/hr	414.00
	L210 Pleadings		
	RR Attend client deposition prep	1.60 195.00/hr	312.00
	L330 Depositions		
8/26/2022	MM Draft correspondence to expert, Chad P., re roof documents, and rebuttal COR report.	0.10 180.00/hr	18.00
	L130 Experts/Consultants		
	MM Review and analyze stipulation and proposed order re disclosure cut off from plaintiff's counsel Penny Manship, in order to evaluate sufficiency for defense of insured.	0.10 180.00/hr	18.00
	L210 Pleadings		
	MM Review and analyze Plaintiff's disclosures for nautilus roofing repair docs in order to ensure expert is prepared for deposition.	0.50 180.00/hr	90.00
	L110 Fact Investigation/Development		
	MM Appear for Zoom deposition preparation meeting w/ expert Chad Polivka, [REDACTED]	0.90 180.00/hr	162.00
	L130 Experts/Consultants		
	MM Review and analyze expert documents, including Plaintiff's expert reports, Khov's expert reports, and Renco's expert, Chad P., including reports, COR, and job file, in preparation for deposition prep meeting with expert Chad P. (492 pages)	0.90 180.00/hr	162.00
	L130 Experts/Consultants		
	MM Appear for and attend deposition of Khov's geotechnical expert, Curt Peterson, in order to defend Renco and make necessary objections and/or examination of witness.	1.70 180.00/hr	306.00
	L330 Depositions		

		<u>Hrs/Rate</u>	<u>Amount</u>
8/26/2022	RR Prepare for deposition of T. Ingo including review of reports (expert), job file materials, and court ruling and documents identified by M. McGillivray L330 Depositions	1.70 195.00/hr	331.50
8/27/2022	MM Review and analyze Khov's expert job file by Bert Howe, in preparation for their expert deposition, including photographs, expert reports and memorandums, communication, references, design plans, specifications, and manufacture guidelines. (3,182 pages) L130 Experts/Consultants	2.10 180.00/hr	378.00
8/28/2022	MM Review and analyze videos of DT and stucco from Khov's expert, Bert Howe's, job file in order to prepare for deposition of Khov's expert. L130 Experts/Consultants	0.30 180.00/hr	54.00
	MM Review and analyze third-party defendant LaBlanc's expert, Evan Marshall's job file including reports, photographs, field notes, references, correspondences, and other documents in preparation for his deposition. (481 pages) L130 Experts/Consultants	1.20 180.00/hr	216.00
8/29/2022	MM Telephone conference w/ expert, Chad Polivka, re status of expert depositions and testimony, discussion of rebuttal COR reports, and project specifications. L130 Experts/Consultants	0.20 180.00/hr	36.00
	MM Review and analyze Renco's job file in preparation for Client, Jeff Nickerson, deposition preparation meeting L110 Fact Investigation/Development	0.40 180.00/hr	72.00
	MM Continue drafting Renco Roofing's 4th supplemental disclosure statement, to continue supplementing defenses for trial, witnesses and scope of testimony, affirmative defenses, and tangible evidence to ensure all necessary components of defense are preserved for trial. (27 pages) L210 Pleadings	0.60 180.00/hr	108.00
	RR Review and analyze and draft correspondents to other sub counsel re: joint defense strategy re: lack of causation testimony (x6) L120 Analysis/Strategy	0.30 195.00/hr	58.50

		<u>Hrs/Rate</u>	<u>Amount</u>
8/29/2022	RR telephone call with L. Horowitz re: settlement continued auth for OJ. L160 Settlement/Non-Binding ADR	0.30 195.00/hr	58.50
	RR attend deposition of Khov expert Terry Ingo L330 Depositions	2.30 195.00/hr	448.50
8/30/2022	MM Review and analyze stipulated order to amend discovery and disclosure landscape in matter filed by Plaintiff's counsel. L210 Pleadings	0.10 180.00/hr	18.00
	MM Review and analyze Plaintiff's 18th supplemental disclosure statement to evaluate for new positions on case, theories, witnesses, and evidence produced and attached documents. L210 Pleadings	0.40 180.00/hr	72.00
	MM Comprehensively review and analyze documents for the deposition of Khov's 30b6, Joe Chelsey, including correspondences, contract, permits, photographs, Khov's specifications, pleadings, and other documents in order to defend Renco Roofing (3130 pages) L330 Depositions	2.10 180.00/hr	378.00
	RR prepare for deposition of framer 30(b)(6) and expert including review of framer job file and expert reports and documents identified by M. McGillivray (Ie Blame and Evan Marshall) L330 Depositions	1.30 195.00/hr	253.50
	RR Review and analyze and draft correspondents to personal counsel, P. Frame re: [REDACTED] L330 Depositions	0.20 195.00/hr	39.00
	RR conference with client and expert re: [REDACTED] L330 Depositions	0.40 195.00/hr	78.00
	RR attend deposition of framer 30(b)(6) L330 Depositions	0.90 195.00/hr	175.50
	RR Attend/ take deposition of Evan Marshall expert for framer L330 Depositions	1.00 195.00/hr	195.00
8/31/2022	MM Conference to expert, Chad P., re discussion re various cost of repairs, foundation for his cost of repair, in preparation for expert's deposition.	0.20 180.00/hr	36.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L130 Experts/Consultants		
8/31/2022	MM	Comprehensively review and analyze subcontract between Renco and K.Hov to investigate relationship of named Khov parties to contracting parties, and evaluate various indemnification and fee shifting provisions in preparation for drafting written offer. (40 pages)	0.30 180.00/hr 54.00
	L110 Fact Investigation/Development		
	MM	Research rule 68 offer of judgment in preparation to draft offer of judgment to the remaining two Khov entities to ensure OJ is sufficient and valid.	0.40 180.00/hr 72.00
	L210 Pleadings		
	MM	Begin drafting Rule 68 offer of judgment to both remaining Khov entities to ensure required apportionment language is included.	0.50 180.00/hr 90.00
	L210 Pleadings		
	MM	Review and analyze documents in preparation for deposition of Liberty Constructor's 30(b)(6) designee, including Liberty's disclosure and pleadings, disclosed documents, contract, work agreement, expert report and other documents. (529 pages)	0.80 180.00/hr 144.00
	L330 Depositions		
	MM	Comprehensively review and analyze documents, including internal job file, photographs, warranty materials, roof repair documents and invoices, contracts, topics of examination, and disclosures, in preparation for deposition meeting with Renco's 30(b)(6) Jeff Nickerson and corporate counsel Rick carter. (481 pages).	1.20 180.00/hr 216.00
	L110 Fact Investigation/Development		
	MM	Appear for deposition preparation meeting with renco's 30(b)(6)/client representative Jeff Nickerson and counsel Rick Carter, to discuss [REDACTED]	1.30 180.00/hr 234.00
	L110 Fact Investigation/Development		
	RR	prepare for deposition of 30(b)(6) of KHov including review of Khov disclosures and portions of job file and documents identified by M. McGillivray (150 pages)	1.40 195.00/hr 273.00
	L330 Depositions		
	RR	telephone call with client J. Nickerson re: additional deposition preparation and questions after review of materials	0.80 195.00/hr 156.00

Hrs/Rate Amount

L330 Depositions

8/31/2022 RR	Attend deposition of Khov 30(b)(6)	1.50	292.50
		195.00/hr	

L330 Depositions

For professional services rendered	<u>169.50</u>	<u>\$31,345.50</u>
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Additional Charges :

Qty

7/29/2022 TLO	Expense for professional services provided by Avalon, Invoice no.: PJUL220016 (per authority of adjuster Randall Langley)	1	447.98
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Total costs		<u>\$447.98</u>
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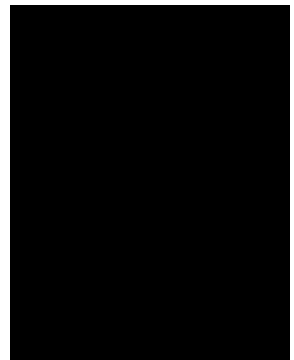
Total amount of this bill		<u>\$31,793.48</u>
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Previous balance

8/9/2022 Payment received from NCS - thank you. Check No. 55152
 8/9/2022 Write off for invoice no. 50590
 9/6/2022 Write off for invoice no. 51708

Total payments and adjustments

Balance due

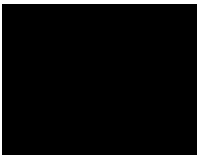


Timekeeper Summary

Name	Hours	Rate	Amount
Rina Rai - Partner	23.90	195.00	\$4,660.50
Shannon Huff- Partner	31.80	195.00	\$6,201.00
Marcus McGillivray	66.40	180.00	\$11,952.00
Mohamad Tokko	47.40	180.00	\$8,532.00

Total fees to date (inclusive of this bill)

Total costs to date (inclusive of this bill)





INVOICE

Invoice # 53310
Date: 12/20/2022
Due On: 01/19/2023

Rai Duer, P.C.

3033 N. Central Avenue, Suite 500
Phoenix, Arizona 85012

National Claim Services-Sept/Dec/Mar/June

3499-A

Renco adv. K. Hovnanian

Services

Type	Date	Attorney	Notes	Quantity	Rate	Total
Service	09/01/2022	MM	Appear for deposition of Desert vista 30(b)(6), Todd Jones, in order to preserve and defend the interests of Renco. (Per randall Langley's authority)	2.10	\$180.00	\$378.00
Service	09/01/2022	MM	Telephone conference call with expert Chad P. and client Jeff Nickerson, in order to discuss [REDACTED]	1.20	\$180.00	\$216.00
Service	09/01/2022	MM	Review and analyze documents in preparation for drafting statutory offer letter to K Hovnanian, including pleadings, contract language re attorneys fees, and A.R.S. 12-341.01	0.40	\$180.00	\$72.00
Service	09/01/2022	MM	Draft statutory offer settlement letter to counsel for khovnanian, re allegations, conclusions of experts and investigation, fee provisions, in order to attempt settlement of case. (2 pages).	0.90	\$180.00	\$162.00
Service	09/01/2022	RR	Prepare for deposition 30(B)(6) of Liberty Constructors including review of their disclosures and job file documents and their expert reports	0.90	\$195.00	\$175.50
Service	09/01/2022	RR	Attend deposition of Todd Sarager (30)(B)(6) for Liberty Constructors	0.80	\$195.00	\$156.00

Service	09/02/2022	MM	Telephone conference w/ expert, Chad Polivka, re cost of repair report and opinions in preparation for expert deposition.	0.40	\$180.00	\$72.00
Service	09/02/2022	MM	Review and analyze documents in preparation to draft 4th supplemental disclosure to ensure all exculpatory and beneficial evidence and documents are disclosed and preserved for trial.	0.40	\$180.00	\$72.00
Service	09/02/2022	MM	Draft 4th supp disclosure to ensure all exculpatory and beneficial evidence and documents are disclosed and preserved for trial. (27 pages)	0.70	\$180.00	\$126.00
Service	09/02/2022	MM	Review and analyze newly disclosed documents and invoices from Nautilus for the June 2022 roof repairs to evaluate cost, scope of repairs, and impact on defense of client. (27 pages)	0.30	\$180.00	\$54.00
Service	09/02/2022	MM	Review and analyze newly disclosed documents by Plaintiff, including project CC&Rs and bylaws and rules, inspection reports, repair reports and investigation, photographs and correspondences in order to evaluate impact on case and defense of Desert Renco (273 pages).	0.90	\$180.00	\$162.00
Service	09/02/2022	MM	Draft proposed court order re motions for summary judgment and disclosure timeframes to ensure sufficient time to defend insured. (3 pages)	0.20	\$180.00	\$36.00
Service	09/02/2022	MM	Draft stipulation to amend court order re disclosure and motion timeframes for case in order to ensure sufficient time to defend insured. (5 pages)	0.30	\$180.00	\$54.00
Service	09/02/2022	RR	Prepare for deposition Renco expert Chad Polivka including review of his expert report Job file and rebuttal reports	2.30	\$195.00	\$448.50
Service	09/02/2022	RR	Defend client deposition	2.00	\$195.00	\$390.00
Service	09/06/2022	MM	Appear for deposition of Desert Vista's Expert witness, West Harrington, in order to appear for Renco to preserve and further their interests and defenses in matter.	3.70	\$180.00	\$666.00
Service	09/06/2022	RR	Attend/Defend deposition of West Harrington (Desert Vista expert)	2.10	\$195.00	\$409.50
Service	09/07/2022	MM	Review and analyze 4th Supplemental Disclosure Statement from Liberty Constructors to evaluate new affirmative	0.20	\$180.00	\$36.00

			defenses, including lack of causation, and new evidence to evaluate impact on case and defense of insured. (16 pages).			
Service	09/07/2022	MM	Review and analyze newly disclosed documents by Liberty Constructors in order to evaluate impact on case or defense of insured. (164 pages)	0.30	\$180.00	\$54.00
Service	09/07/2022	MM	Review and analyze Plaintiff's amended responses to renco's NUIs and RFAS to evaluate impact on case. (21 pages).	0.40	\$180.00	\$72.00
Service	09/07/2022	MM	Review and analyze plaintiff's original responses to nuis and rfas by renco to evaluate changes in amended responses (33 pages); Review and analyze Plaintiff's 19th disclosure (36)	0.60	\$180.00	\$108.00
Service	09/07/2022	MM	Review and analyze Plaintiff's 19th disclosure in order to evaluate supplements to claims, damages, exhibits, and other materials to evaluate impact on case and defense of desert vista. (36 pages)	0.30	\$180.00	\$54.00
Service	09/08/2022	RR	RIA and draft correspondent to plaintiff counsel RE: motion to summary judgement deadline (x4)	0.20	\$195.00	\$39.00
Service	09/12/2022	MM	Review and analyze stipulation and proposed order dismissing third part defendant Home Builders Site Services in order to evaluate impact on defense of case and renco.	0.10	\$180.00	\$18.00
Service	09/13/2022	MM	Review and analyze third party defendant Liberty Constructions 5th supplemental disclosure statement with exhibits, to evaluate responses to claims, defenses, and witnesses.	0.20	\$180.00	\$36.00
Service	09/14/2022	MM	3499: Review and analyze documents, expert reports, photographs, and correspondences in preparation for deposition of expert Alan Shelton, for TPC Liberty Constructions, in order to appear for deposition on behalf of Renco. (392 pages, per Randal Langley authority)	1.60	\$180.00	\$288.00
Service	09/14/2022	MM	3499-A: Appear for Deposition of Liberty Constructor's expert, Allen Shelton, to ensure appearance is made on behalf of Renco to address questions implicating Renco to further defense.	1.40	\$180.00	\$252.00
Service	09/14/2022	MM	Review and analyze subpoena's issued by claimants to Grand Materials & supply to	0.10	\$180.00	\$18.00

			evaluate validity of sub, and information sought and impact on defense of case.			
Service	09/15/2022	MM	Review and analyze Plaintiff's updated/ amended written discovery verifications to evaluate impact on case and defense of insured.	0.20	\$180.00	\$36.00
Service	09/19/2022	MM	3499-A: draft correspondence to plaintiff's counsel, Penny Manship, re meet and confer re dispositive motion timeframe.	0.10	\$180.00	\$18.00
Service	09/19/2022	MM	3499-A: Review and analyze file, including Court Order re excluding Khov's untimely expert reports, correspondences, and expert reports, in preparation to draft status update to adjuster Randall Langley. (66 pages)	0.40	\$180.00	\$72.00
Service	09/19/2022	MM	3499-A: Draft status update correspondence to adjuster Randall Langley, [REDACTED]	0.10	\$180.00	\$18.00
Service	09/20/2022	MM	3499-A: Telephone conferences w/ plaintiff's counsel Penny Manship, re meet and confer over dispositive motion timeframe and impact on case. (3 calls)	0.30	\$180.00	\$54.00
Service	09/20/2022	MM	3499-A: Continue drafting proposed stipulation and court order re timeframes for disclosure and dispositive motions. (2 documents, 8 pages)	0.40	\$180.00	\$72.00
Service	09/20/2022	MM	review and analyze correspondence from adjuster, Randall Langley, re [REDACTED]	0.10	\$180.00	\$18.00
Service	09/20/2022	MM	Draft correspondence to all parties re proposed stipulation and order re case time frames for disclosure and dispositive motions to file with court.	0.10	\$180.00	\$18.00
Service	09/22/2022	MM	3499-A: Conduct legal research re causation standard/burden, expert testimony, and indemnification, in preparation to draft Motion for Summary Judgment (with Randall Langley authority, 9/20/22)	0.80	\$180.00	\$144.00
Service	09/22/2022	MM	Review and analyze correspondence from Plaintiff's counsel, Penny Manship, re permission to file proposed order re disclosure and motions with court.	0.10	\$180.00	\$18.00

Service	09/22/2022	MM	Draft correspondence to defense counsel, Jason Boblick, re proposed order re discovery, disclosure, and motions to evaluate position.	0.10	\$180.00	\$18.00
Service	09/22/2022	MM	Review and analyze correspondence from defense counsel, Jason Boblick, re proposed order re discovery, disclosure, and motions to evaluate position and permission to file.	0.10	\$180.00	\$18.00
Service	09/24/2022	MM	3499-A: Review and analyze deposition transcription of Renco's expert witness Chad Polivka, in preparation for for drafting Renco's motion for summary judgment. (76 pages, reviewed with Randall Langley Authority 9/22/22).	1.10	\$180.00	\$198.00
Service	09/24/2022	MM	Review and analyze deposition transcript of Plaintiff's expert witness, Ed Fronapfel, to evaluate for testimony that there is no other cost of repair for stucco, no fault or causation opinion, and helpful testimony in preparation for drafting MSJ (165 pages, with Randall Langley authority)	0.80	\$180.00	\$144.00
Service	09/24/2022	MM	Review and analyze deposition transcript of Renco Roofing rep Jeff Nickerson, in order to evaluate testimony re fault, or work noncomplying with specs or industry standards, and other useful testimony in preparation for drafting motion for summary judgment against Khov (68 pages, with Randall Langley's authority 9/20/22)	0.60	\$180.00	\$108.00
Service	09/24/2022	MM	Review and analyze expert reports for KHov by Bert Howe to review to ensure no opinions or conclusions re fault of subcontractors are included in preparation for drafting motion for summary judgment (67 pages, with Randall Langley authority 9/20/22)	0.40	\$180.00	\$72.00
Service	09/24/2022	MM	Review and analyze Plaintiff's expert reports by SBSA Ed Fronapfel, in preparation to draft motion for summary judgment by review report to ensure no opinions of causation or subcontractors who may be liable. (3 reports, 323 pages, with Randal Langley's authority, 9.20,22).	0.90	\$180.00	\$162.00
Service	09/25/2022	MM	3499-A: Begin drafting Motion for Summary judgment against general contractor Khovnanian on grounds of lack of causation. (6 pages with Randal Langley authority)	2.70	\$180.00	\$486.00

Service	09/26/2022	RR	Telephone all with W. Harrington RE: [REDACTED]	0.60	\$195.00	\$117.00
Service	09/26/2022	RR	Extensive telephone call with L. Horowitz, Khov counsel RE: MSJ's forthcoming and extrapolation motion assistance	0.60	\$195.00	\$117.00
Service	09/26/2022	RR	Review plaintiff's job file for evidence of improper foam app for MSJ (1000's pages)	1.40	\$195.00	\$273.00
Service	09/26/2022	RR	RIA and draft correspondent to L. Horowitz RE: MSJ RE: extrapolation against plaintiff (x4)	0.20	\$195.00	\$39.00
Service	09/27/2022	MM	3499-A: Continue drafting Motion for Summary Judgment re Causation, including argument section against indemnity, duty to defend, negligence and contribution. (11 pages, with randall langley's authority)	4.30	\$180.00	\$774.00
Service	09/27/2022	MM	3499-A: Conduct legal research on timing of duty to defend and whether there is a causation trigger. (With Randall Langley's authority)	1.20	\$180.00	\$216.00
Service	09/28/2022	MM	3499-A: Review and analyze Renco's insurance policy with United Specialty (Policy No. ATN-SF1944431), in order to review for additional insureds and if K.Hov is named in preparation to continue drafting motion for summary judgment. (62 pages, reviewed with Randall Langley authority 9/20/22)	0.40	\$180.00	\$72.00
Service	09/28/2022	MM	3499-A: Review and analyze Renco's insurance policy with United Specialty (Policy No. ATN-SF1944431), in order to review for additional insureds and if K.Hov is named in preparation to continue drafting motion for summary judgment. (62 pages, reviewed with Randall Langley authority 9/20/22)	0.40	\$180.00	\$72.00
Service	09/28/2022	MM	3499-A: Review and analyze Renco's insurance policy with United Specialty (Policy No. ATN-SF1831819), in order to review for additional insureds and if K.Hov is named in preparation to continue drafting motion for summary judgment. (62 pages, reviewed with Randall Langley authority 9/20/22)	0.40	\$180.00	\$72.00
Service	09/28/2022	MM	3499-A: Review and analyze Renco's insurance policy with United Specialty (Policy No. ATN-SF1720555), in order to review for additional insureds and if K.Hov	0.40	\$180.00	\$72.00

			is named in preparation to continue drafting motion for summary judgment. (65 pages, reviewed with Randall Langley authority 9/20/22)			
Service	09/28/2022	MM	3499-A: Review and analyze documents, including job file, documents disclosed by Plaintiff and Khov, necessary to support factual allegations in MSJ to ensure no issue of fact fatal to summary judgment exists, and in preparation to draft statement of facts of MSJ and Separate Statement of facts. (812 pages, reviewed with Randall Langley's authority, 9/20/22).	1.80	\$180.00	\$324.00
Service	09/28/2022	MM	3499-A: Continue drafting Motion for Summary judgment on all causes of action brought by KHov, including statement of facts section, and introduction, arguments re negligence claims and contribution. (19 pages, with Randal Langley's authority 9/20/22)	3.40	\$180.00	\$612.00
Service	09/28/2022	MM	Draft correspondence to adjuster, Randall Langley, [REDACTED]	0.20	\$180.00	\$36.00
Service	09/28/2022	MM	Review and analyze correspondence from adjuster, Randall Langley, [REDACTED]	0.20	\$180.00	\$36.00
Service	09/28/2022	RR	Outline MSJ re: duty to defend	0.60	\$195.00	\$117.00
Service	09/28/2022	RR	Telephone call with West Harrington expert, RE: need for affidavit to accompany extrapolation motion	0.30	\$195.00	\$58.50
Service	09/28/2022	RR	Telephone call with Horowitz RE: extrapolation motion and settlement (global) other (x2)	0.30	\$195.00	\$58.50
Service	09/29/2022	MM	3499-A Review and analyze documents in preparation to draft SSOF for MSJ. (213 pages, with Randall Langley's authority).	0.80	\$180.00	\$144.00
Service	09/29/2022	MM	3499-A: Draft mandatory comprehensive separate status of facts required for Motion for summary judgment, alleging facts and citing to supporting documents that support material facts being undisputed and summary judgment being warranted. (8 pages, with Randall Langley's authority 9/20/22)	3.10	\$180.00	\$558.00
Service	09/29/2022	RR	Draft portion of MSJ RE: econ loss	1.30	\$195.00	\$253.50

			doctrine, disgusted indemnity claims, and duty to defend (4 pages)			
Service	09/29/2022	RR	Draft expert affidavit to support MSJ	0.40	\$195.00	\$78.00
Service	09/29/2022	RR	Finalize MSJ	0.70	\$195.00	\$136.50
Service	09/30/2022	MM	3499-A: Continue drafting motion for summary judgment, including argument section re duty to defend and additional insured satisfaction, example re drywall defects requiring causation, and conclusion. (18 pages, drafted with Randall Langley's authority 9/20/22).	1.20	\$180.00	\$216.00
Service	09/30/2022	MM	3499-A: Continue drafting separate statement of facts mandatory for motion for summary judgment to includes necessary facts regarding AI payments and coverage, and expert report contents. (8 pages, drafted with Randall Langley's authority 9/20/22).	0.60	\$180.00	\$108.00
Service	09/30/2022	MM	Comprehensively review and analyze KHov's Motion for summary judgment against Plaintiff on grounds of the Condo Association not having standing to bring contract and warranty claims, to evaluate impact on case, on defense of Renco, and whether joinder is appropriate.	0.30	\$180.00	\$54.00
Service	09/30/2022	MM	Review and analyze all exhibits and attachments to KHov's motion for summary judgment on all causes of action brought by plaintiff, to evaluate strength of documents, and impact on case of summary judgment and on settlement negotiations. (198 pages)	0.60	\$180.00	\$108.00
Service	09/30/2022	MM	Review and analyze KHov's mandatory Separate Statement of Facts to Support Motion for Summary Judgment, to evaluate the undisputed material facts, to evaluate merit and relevance to motion to evaluate impact on case and defense of Renco	0.30	\$180.00	\$54.00
Service	09/30/2022	MM	Review and analyze Liberty Constructor's motion for summary judgment against KHOV, to evaluate legal arguments and facts, in order to evaluate impact on case, defense of Renco, and whether a joinder is warranted.	0.30	\$180.00	\$54.00
Service	09/30/2022	MM	Review and analyze mandatory separate statement of facts attached to Liberty Constructor's motion for summary judgment, to evaluate merit of argument	0.20	\$180.00	\$36.00

			and weight of undisputed facts to evaluate impact on case, defense of Renco, and whether a joinder is necessary.			
Service	09/30/2022	MM	Review and analyze exhibits and documents attached to Liberty Constructor's motion for summary judgment to evaluate impact on case and whether additional documents may further Insured's argument, and if joinder is warranted. (134 pages)	0.50	\$180.00	\$90.00
Service	09/30/2022	RR	Assist Khov in drafting MSJ RE: extrapolation	0.90	\$195.00	\$175.50
Service	09/30/2022	RR	Prepare for deposition of J. Karr of Advise and consult Gypsum expert, including review of proposed exhibits by WC (90+ pages)	0.40	\$195.00	\$78.00
Service	09/30/2022	RR	Attend deposition of J. Karr, Gypsum expert	1.50	\$195.00	\$292.50
Service	10/03/2022	MM	Telephone conference with AI adjuster, Chris K., [REDACTED]	0.30	\$180.00	\$54.00
Service	10/03/2022	MM	Comprehensively review and analyze GC KHovnanian's motion for partial summary judgment re extrapolation, to review factual and legal arguments, pertinent alleged defects, in preparation for drafting substantive joinder.	0.40	\$180.00	\$72.00
Service	10/03/2022	MM	Review and analyze Separate Statement of Facts required to be attached to KHov's MSJ re extrapolation, in order to evaluate the undisputed facts relied on by KHov in preparation to evaluate impact on case and to evaluate potential joinder.	0.30	\$180.00	\$54.00
Service	10/03/2022	MM	Comprehensively review and analyze exhibits and documents attached to KHov's MSJ re extrapolation, including pertinent expert depositions and reports, declarations, and other evidence in order to evaluate impact on defense of Renco. (125 pages)	0.40	\$180.00	\$72.00
Service	10/04/2022	MM	Review and analyze Renco Additional Insured ror from carrier re defense payments made to KHov's counsel in order to address on MSJ Reply and to evaluate impact on defense of case and argument	0.30	\$180.00	\$54.00
Service	10/06/2022	MM	Review and analyze Liberty Constructor's	0.20	\$180.00	\$36.00

			amended declaration for motion for summary judgment re causation.			
Service	10/11/2022	MM	Review and analyze documents, including minute entries, disclosures, and joint pre-trial statement, in preparation to attend mandatory court hearing on behalf of Renco (97 pages)	0.40	\$180.00	\$72.00
Service	10/11/2022	MM	Appear for mandatory court conference re trial and outstanding motions on behalf of Renco, to discuss status of case, remaining parties, outcome of mediation, and trial structure.	0.40	\$180.00	\$72.00
Service	10/19/2022	MM	Review and analyze comprehensive Court order re trial, motions in limine, and other pertinent trial submission timeframes.	0.10	\$180.00	\$18.00
Service	11/11/2022	MT	Review and analyzed clients' joint motion for summary judgment and separate statement of facts, KHov's response to summary judgment and statement of facts, and controverting statement of facts in preparation of drafting reply in support of MSJ.	1.50	\$180.00	\$270.00
Service	11/14/2022	MT	Review and analyzed previous status report to carrier, recent pleadings (MSJ), most recent plaintiff and client disclosure statements, and relevant correspondence in preparation of drafting status report to carrier.	0.50	\$180.00	\$90.00
Service	11/14/2022	MT	Drafted status report to carrier to provide an update on civil proceeding, [REDACTED]	1.50	\$180.00	\$270.00
Service	11/14/2022	MT	Review and analyzed court order re: extension of KHov's response to MSJ in preparation of drafting reply in support of MSJ.	0.10	\$180.00	\$18.00
Service	11/15/2022	MT	Drafted updated impact report to carrier and added additional analysis on [REDACTED]	1.20	\$180.00	\$216.00
Service	11/16/2022	MT	Drafted reply in support of joint motion for summary judgment as to all of KHov's claims to include additional analysis of rebuttal arguments to Khov's response. [additional 4 pgs drafted].	1.50	\$180.00	\$270.00

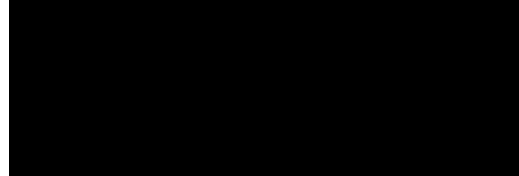
Service	11/16/2022	RR	draft 1 page of status update to include motion practice and settlement status with plaintiff.	0.60	\$195.00	\$117.00
Service	11/18/2022	MT	Review and analyzed Khov previous expert reports, its response to joint motion for summary judgment and controverting and separate statement of facts in preparation of further analyzing response in preparation of continuing to draft reply in support of motion for summary judgment to flesh out additional arguments to support MSJ.	1.00	\$180.00	\$180.00
Service	11/18/2022	MT	Drafted reply in support of joint motion for summary judgment and revision portions of analysis in lack of expert evidence argument, additional analysis of each cause of action by Khov, and additional analysis of our expert disposition testimony in aid of supporting motion for summary judgment. 10 pgs drafted total.	1.80	\$180.00	\$324.00
Service	11/18/2022	RR	Ext. TCW m. Ludwig, sub defense counsel re: status of settlement negotiations and motion practice	0.40	\$195.00	\$78.00
Service	11/21/2022	MT	Drafted and revised reply in support of joint motion for summary judgment and drafted additional analysis and revisions on expert opinions cited by KHOV.	0.50	\$180.00	\$90.00
Service	11/22/2022	RR	Draft portion of Reply to MSJ to include discussion of courts prior rulings related to fault and causation opinions by Khov.	0.80	\$195.00	\$156.00
Service	11/22/2022	MT	Drafted and revised reply in support of joint motion for summary judgment to finalize by making revisions to factual analysis and indemnification clause analysis with anti-indemnity clause in preparation of filing reply.	0.60	\$180.00	\$108.00
Service	11/22/2022	MT	Teleconference with carrier Mary to discuss [REDACTED]	0.30	\$180.00	\$54.00
Service	11/22/2022	MT	Teleconference with carrier Chris to further discuss [REDACTED]	0.40	\$180.00	\$72.00

Service	11/28/2022	RR	Conf. with counsel for KHov re: motion practice and arguments for Reply brief.	0.70	\$195.00	\$136.50
Services Subtotal						\$14,754.00

Expenses

Type	Date	Notes	Quantity	Rate	Total	
Expense	08/22/2022	Court Filing Fee Form Set #7123861	1.00	\$6.70	\$6.70	
Expense	08/25/2022	Expense for professional services provided by Nautilus Building Consultants, Inc. Invoice no. 13163 (1/2 expense billed)	1.00	\$56.25	\$56.25	
Expense	08/30/2022	Court Filing Fee Form Set #7151952	1.00	\$6.70	\$6.70	
Expense	09/02/2022	Expense for professional services provided by Esquire Deposition Solutions, Invoice no.: INV2285109 (1/2 expense billed)	1.00	\$432.30	\$432.30	
Expense	09/07/2022	Expense for professional services provided by Esquire Deposition Solutions, Invoice no.: INV2287447 (1/2 expense billed)	1.00	\$403.87	\$403.87	
Expense	09/13/2022	Expense for professional services provided by Esquire Deposition Solutions, Invoice no.: INV2291223 (1/2 expense billed)	1.00	\$495.00	\$495.00	
Expense	09/14/2022	Expense for professional services provided by Esquire Deposition Solutions, Invoice no.: INV2293025 (1/2 expense billed)	1.00	\$332.40	\$332.40	
Expense	09/16/2022	Expense for professional services provided by Esquire Deposition Solutions, Invoice no.: INV2295495 (1/2 expense billed)	1.00	\$482.45	\$482.45	
Expense	09/19/2022	Expense for professional services provided by Esquire Deposition Solutions, Invoice no.: INV2297010 (1/2 expense billed)	1.00	\$264.82	\$264.82	
Expense	09/19/2022	Expense for professional services provided by Esquire Deposition Solutions, Invoice no.: INV2297020 (1/2 expense billed)	1.00	\$376.80	\$376.80	
Expense	09/19/2022	Expense for professional services provided by Esquire Deposition Solutions, Invoice no.: INV2297013 (1/2 expense billed)	1.00	\$185.62	\$185.62	
Expense	09/30/2022	Expense for court filing fees, FormSet #7256197	1.00	\$6.70	\$6.70	
Expense	11/22/2022	Expense for court filing fees, FormSet #7424466	1.00	\$6.70	\$6.70	
Expenses Subtotal						\$3,056.31

Time Keeper	Quantity	Rate	Total
Marcus McGillivray	49.4	\$180.00	\$8,892.00
Rina Rai	20.0	\$195.00	\$3,900.00
Mohamad Tokko	10.9	\$180.00	\$1,962.00
Subtotal			\$17,810.31
Total			\$17,810.31



Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
53310	01/19/2023	\$17,810.31		
			Outstanding Balance	
			Total Amount Outstanding	

Please make all amounts payable to: Rai Duer, P.C. Tax ID: 20-1799878

Please pay within 30 days.