

# EXHIBIT B

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

January 20, 2022

Invoice submitted to:

National Claims Service  
Alexis Grant

In Reference To: Case Name: Desert Vista adv. K. Hovnanian  
Project Name: The Gallery in Scottsdale  
Claim Number: 48576  
Date of Loss:  
Cause Number:  
Attn: Alexis Grant

Invoice # 50691

Professional Services

			<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	
	SRG	Teleconference with A.Grant regarding representation of Desert Vista and default.	0.20	39.00
		L120 Analysis/Strategy	195.00/hr	
10/20/2021	SRG	Teleconference to corporate counsel P.Frame regarding request for information .1	0.10	19.50
		L110 Fact Investigation/Development	195.00/hr	
	SRG	Drafted adjuster correspondence regarding request for information for defense .1	0.10	19.50
		L110 Fact Investigation/Development	195.00/hr	
	SRG	Drafted client correspondence regarding [REDACTED]	0.20	39.00
		L110 Fact Investigation/Development	195.00/hr	

			<u>Hrs/Rate</u>	<u>Amount</u>
10/20/2021	SRG	Teleconference to H.Davies regarding request for information related to Desert Vista, notice of appearance, and other information on case proceedings.  L110 Fact Investigation/Development	0.30 195.00/hr	58.50
	SRG	Teleconference with Chris of Desert Vista regarding [REDACTED].  L110 Fact Investigation/Development	0.40 195.00/hr	78.00
10/22/2021	MT	Drafted correspondence to expert on behalf of Desert Vista (adv. K Hov), regarding expert opinions. (case not created yet).  L130 Experts/Consultants	0.20 180.00/hr	36.00
	MT	Teleconference with expert to discuss scope of work in preparation of expert analysis once appearance is made.  L130 Experts/Consultants	0.30 180.00/hr	54.00
	SRG	Teleconference to corporate counsel responding to request for information.  L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Drafted corporate counsel response to request for information .1  L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed correspondence regarding mediation and settlement negotiations .1  L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
10/25/2021	TLO	Draft Certificate Regarding Expert Testimony  L210 Pleadings	0.20 95.00/hr	19.00
	TLO	Draft Certificate Regarding Compulsory Arbitration  L210 Pleadings	0.20 95.00/hr	19.00
	MT	Review and analyzed complaint, third-party complaint, and relevant correspondence in preparation of drafting Answer to third-party complaint.  L210 Pleadings	0.40 180.00/hr	72.00
	MT	Drafted Answer to third-party complaint, which included ten (10) counts alleged against client. Drafted affirmative defenses. (total 13 pgs).	2.60 180.00/hr	468.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L210 Pleadings		
10/25/2021	SRG	Drafted corporate counsel reply to status of future proceedings.	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Revise answer and affirmative defenses for filing answer on behalf of client.	0.20 195.00/hr	39.00
		L210 Pleadings		
	SRG	Reviewed documents provided by K.Hov. Including project documents and contract in preparation for supplementing answer to complaint and affirmative defenses for filing	0.40 195.00/hr	78.00
		L210 Pleadings		
	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	MT	Teleconference with client corporate counsel to discuss case [REDACTED]	0.30 180.00/hr	54.00
		L120 Analysis/Strategy		
	MT	Review and analyzed limited relevant claim file including correspondence, tender letters, disclosures, and third-party complaint/answers in preparation of drafting initial status report to carrier.	0.50 180.00/hr	90.00
		L120 Analysis/Strategy		
	MT	Drafted initial status report to carrier and discussed [REDACTED]	2.60 180.00/hr	468.00
		L120 Analysis/Strategy		
	SRG	Drafted client response to project information .1	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		
	SRG	Reviewed and analyzed client project documents and information .1	0.10 195.00/hr	19.50
		L110 Fact Investigation/Development		

			<u>Hrs/Rate</u>	<u>Amount</u>
10/26/2021	SRG	Teleconference to H.Davies regarding representation of Desert Vista and request for information on repairs and investigation of claims.  L110 Fact Investigation/Development	0.20 195.00/hr	39.00
10/27/2021	SRG	Reviewed H.Davies correspondence regarding discovery of new construction defects.  L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed correspondence and Subpoena in a Civil Case to Trestle Management Group, LLC. .1  L310 Written Discovery	0.10 195.00/hr	19.50
	SRG	Teleconference with H.Davies (K.Hov) regarding mediation and case proceedings and request for information .2  L110 Fact Investigation/Development	0.20 195.00/hr	39.00
10/28/2021	MT	Drafted correspondence to client and corporate counsel regarding [REDACTED]  L110 Fact Investigation/Development	0.10 180.00/hr	18.00
	MT	Review and analyzed corporate counsel correspondence, third-party complaint, and relevant documents in preparation of drafting tender letter to First Mercury carrier to defend in mediation.  L120 Analysis/Strategy	0.30 180.00/hr	54.00
	MT	Teleconference with expert Dave Ball to discuss matter, expert opinions, status of case, and legal strategy in preparation of disclosing expert opinions.  L130 Experts/Consultants	0.30 180.00/hr	54.00
	MT	Drafted tender letter to First Mercury Insurance to request defense and indemnification in upcoming mediation and in case.  L120 Analysis/Strategy	0.60 180.00/hr	108.00
	MT	Review and analyzed new client documents, including opposing counsel correspondence, demands, tenders and attachments, and history of pleadings, notice of claim, and contract documents (~200 pgs) [REDACTED]  L120 Analysis/Strategy	1.00 180.00/hr	180.00

			<u>Hrs/Rate</u>	<u>Amount</u>
10/28/2021	SRG	Drafted adjuster correspondence regarding project and case documents .1  L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed adjuster correspondence regarding project and case documents .1  L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Revised J.Boblick correspondence regarding expert discovery.  L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG	Reviewed H.Davies correspondence regarding mediation and discovery.  L340 Expert Discovery	0.10 195.00/hr	19.50
10/29/2021	SRG	Initial review of A.Grant correspondence and claim file including tender history from K.Hov, client's insurance history and applicable insurance policies for tenders for defense and indemnity, correspondence, attachments and letters, and master agreement in preparation of initial report and legal analysis for liability, defense and indemnity. (appx 200 pages)  L120 Analysis/Strategy	1.20 195.00/hr	234.00
11/1/2021	MT	Review and analyzed and drafted correspondence to/from plaintiff counsel Holly re: expert opinions and mediation.  L120 Analysis/Strategy	0.10 180.00/hr	18.00
	MT	Drafted correspondence to expert with details of scope of expert reports in preparation of new expert opinion deadline and scope of work.  L130 Experts/Consultants	0.10 180.00/hr	18.00
	MT	Teleconference with expert Dave Ball re: CORE report for expert opinions.  L130 Experts/Consultants	0.20 180.00/hr	36.00
	MT	Finished review and analyzed new client documents, including opposing counsel correspondence, demands, tenders and attachments, and history of pleadings, notice of claim, and contract documents (~200 pgs) [REDACTED] [REDACTED]  L120 Analysis/Strategy	0.30 180.00/hr	54.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2021	MT Teleconference with expert to discuss [REDACTED] [REDACTED]	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 prepare and supplement client's disclosure of lay witnesses to comply with scheduling order.	0.30 195.00/hr	58.50
	L310 Written Discovery		
11/2/2021	MT 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.	0.10 180.00/hr	18.00
	L120 Analysis/Strategy		
	MT Review and analyzed expert's CV [REDACTED] [REDACTED]	0.10 180.00/hr	18.00
	L130 Experts/Consultants		
	MT Teleconference with expert to discuss [REDACTED] [REDACTED]	0.20 180.00/hr	36.00
	L130 Experts/Consultants		
	MT Drafted status report by making revisions and including analysis on K [REDACTED] [REDACTED].	1.10 180.00/hr	198.00
	L120 Analysis/Strategy		
	SRG Reviewed defense counsel A.Hough regarding settlement negotiations.	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
	SRG Teleconference from Claimant counsel regarding claims and settlement negotiations .2	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L160 Settlement/Non-Binding ADR		
11/2/2021	SRG	Revise and supplement initial impact report regarding case status, [REDACTED]	1.10 195.00/hr	214.50
		L120 Analysis/Strategy		
11/3/2021	MT	Drafted correspondence to K Hov counsel re: homeowners matrix and COE dates in preparation of handling case and tendering to First Mercury.	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		
	MT	Review and analyzed correspondence from K Hov counsel re: access to units where repairs were conducted including repairs for expert review.	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		
	SRG	Reviewed and analyzed response and request for information to tender for defense and indemnity from West Coast on behalf of First Mercury.	0.10 195.00/hr	19.50
		L120 Analysis/Strategy		
	SRG	Reviewed and analyzed defense counsel 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 H.Davies correspondence regarding investigation of claimant's defect allegations. .1	0.10 195.00/hr	19.50
		L340 Expert Discovery		
11/4/2021	MT	Drafted correspondence to client re: [REDACTED] [REDACTED].	0.10 180.00/hr	18.00
		L110 Fact Investigation/Development		
	MT	Drafted correspondence to client re: [REDACTED] [REDACTED].	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		
	MT	Drafted correspondence to adjuster re: u [REDACTED] [REDACTED].	0.10 180.00/hr	18.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L130 Experts/Consultants		
11/4/2021	MT Drafted correspondence to expert re: [REDACTED]	0.10 180.00/hr	18.00
	L130 Experts/Consultants		
	MT Review and analyzed and drafted correspondence to First Mercury, client Desert, and client corporate counsel re: [REDACTED]	0.30 180.00/hr	54.00
	L120 Analysis/Strategy		
	MT Review and analyzed claim file including complaint, third-party complaint, status reports, expert reports, expert correspondence, and disclosures/discovery in preparation of drafting premediation memorandum for mediation.	0.60 180.00/hr	108.00
	L160 Settlement/Non-Binding ADR		
	MT Began drafting premediation report to carrier to include [REDACTED]	1.00 180.00/hr	180.00
	L160 Settlement/Non-Binding ADR		
	SRG Teleconference to client requesting p [REDACTED]	0.10 195.00/hr	19.50
	L110 Fact Investigation/Development		
	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.	0.20 195.00/hr	39.00
	L310 Written Discovery		
11/5/2021	MT Drafted correspondence to client re: [REDACTED]	0.10 180.00/hr	18.00
	L110 Fact Investigation/Development		
	MT Review and analyzed and drafted correspondence to/from First Mercury ins counsel re: tender of claim and policy period.	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
	MT Teleconference with expert to discuss details of the Project in preparation of inspection.	0.20 180.00/hr	36.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L130 Experts/Consultants		
11/5/2021	MT Review and analyzed correspondence from client re: [REDACTED] [REDACTED].	0.30 180.00/hr	54.00
	L120 Analysis/Strategy		
MT	Review and analyzed claim file including complaint, third-party complaint, answer, correspondence, master agreements, and relevant policy in preparation of drafting initial disclosure statement.	0.60 180.00/hr	108.00
	L310 Written Discovery		
MT	Drafted client's initial disclosure statement including factual background, claims and analysis, witnesses, evidence, insurance policy, etc in preparation of disclosure.	1.70 180.00/hr	306.00
	L310 Written Discovery		
11/8/2021	MT Drafted correspondence to adjuster re: [REDACTED] [REDACTED].	0.10 180.00/hr	18.00
	L120 Analysis/Strategy		
MT	Teleconference with client to discuss [REDACTED] [REDACTED].	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
MT	Teleconference with K Hov counsel re: upcoming inspection details.	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
MT	Review and analyzed any job file associated with client including K Hov disclosed master agreement and work addendum in preparation of conference call with K Hov counsel tomorrow.	0.50 180.00/hr	90.00
	L120 Analysis/Strategy		
SRG	Reviewed Plaintiff correspondence regarding expert discovery and scope of inspection .1	0.10 195.00/hr	19.50
	L340 Expert Discovery		
SRG	Reviewed K.Hov correspondence regarding expert discovery and scope of inspection .1	0.10 195.00/hr	19.50
	L340 Expert Discovery		

		<u>Hrs/Rate</u>	<u>Amount</u>
11/9/2021	MT Review and analyzed Stucco ICC-ES report [REDACTED] [REDACTED] L120 Analysis/Strategy	0.20 180.00/hr	36.00
	MT Drafted correspondence to expert re: [REDACTED] [REDACTED] L120 Analysis/Strategy	0.20 180.00/hr	36.00
	MT Drafted correspondence to client re: [REDACTED] [REDACTED] L120 Analysis/Strategy	0.30 180.00/hr	54.00
	MT Prepared for conference call with K Hov counsel in Gallery matter by drafting questions to discuss in case.  L120 Analysis/Strategy	0.30 180.00/hr	54.00
	MT Teleconference with K Hov counsel to discuss expert findings and issues with stucco in preparation of mediation and resolution. Discussed outstanding factual questions regarding client work and expert opinions.  L120 Analysis/Strategy	0.50 180.00/hr	90.00
	SRG Reviewed file in preparation for conference with K.Hov's counsel regarding investigation, case status and discovery issues per request by K.Hov counsel.  L120 Analysis/Strategy	0.20 195.00/hr	39.00
	SRG Teleconference from K.Hov regarding its outstanding discovery responses .2  L310 Written Discovery	0.20 195.00/hr	39.00
11/11/2021	MT Teleconference with client to prepare for tomorrow's inspection, discuss [REDACTED] [REDACTED] L120 Analysis/Strategy	0.30 180.00/hr	54.00
	MT Teleconference with expert to prepare for tomorrow's inspection, discuss [REDACTED] [REDACTED] L130 Experts/Consultants	0.40 180.00/hr	72.00
	SRG Teleconference with expert in preparation for site inspections to further discuss [REDACTED]	0.20 195.00/hr	39.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L340 Expert Discovery		
11/12/2021	DL Attended and oversaw inspection of with expert John Somoskovec inspecting drywall work at 3125 N.71st Street Scottsdale Arizona 85251. Units 3105, 3111, 3115, 3117, 3127, 3110, 3122, 3113, 3109, 3125, 3121 (Appeared with adjuster's authority) (Travel time was not included in entry. less than 100 miles round trip and therefore not billable).	2.80 180.00/hr	504.00
	L110 Fact Investigation/Development		
	DL Attended and oversaw inspection of with expert John Somoskovec inspecting drywall work at 3125 N.71st Street Scottsdale Arizona 85251. Units 3124, 3118, 3106, 3116, 3112, 3110, 3104 (Appeared with adjuster's authority) (Travel time was not included in entry. less than 100 miles round trip and therefore not billable).	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	MT Teleconference with expert West to discuss post-inspection information [REDACTED].	0.30 180.00/hr	54.00
	L130 Experts/Consultants		
	MT Review and analyzed parts of client claim file for Gallery Project, specifically, Khov Gallery folder with approved plans, bid proposals, agreements, Gallery Bid sheets, maps, and schedule pricing and Khov specifications (~200 pgs) in preparation of drafting initial disclosure statement and determining merits of defenses.	1.90 180.00/hr	342.00
	L110 Fact Investigation/Development		
	SRG Teleconference with plaintiff regarding mediation and resolution of claims against client .2	0.20 195.00/hr	39.00
	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

		<u>Hrs/Rate</u>	<u>Amount</u>
	L250 Other Written Motions and Submissions		
11/17/2021	MT Review and analyzed client claim file for Gallery Project, specifically, relevant documents, invoices, plans, proposals, some repairs and files for Lots 1 through 6 (~400 pgs) in preparation of drafting initial disclosure statement and determining merits of defenses.	2.60 180.00/hr	468.00
	L110 Fact Investigation/Development		
11/18/2021	MT Review and analyzed client claim file for Gallery Project, specifically, relevant documents, invoices, plans, proposals, and files for Lots 7 through 12 (~250 pgs) in preparation of drafting initial disclosure statement and determining merits of defenses.	1.70 180.00/hr	306.00
	L110 Fact Investigation/Development		
	MT Review and analyzed final client claim file for Gallery Project, specifically, relevant documents, invoices, plans, proposals, and files for Lots 13 through 18 (~230 pgs) in preparation of drafting initial disclosure statement and determining merits of defenses.	1.80 180.00/hr	324.00
	L110 Fact Investigation/Development		
	MT Drafted initial disclosure statement, specifically, legal theories of defense for each of the ten counts, defenses, added additional lay witnesses and expert witnesses, and all tangible evidence that will be disclosed pursuant to my review of the client claim file. Proofread and made revisions.	2.20 180.00/hr	396.00
	L310 Written Discovery		
	SRG Reviewed mediator correspondence and request for information.	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
	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

		<u>Hrs/Rate</u>	<u>Amount</u>
	L130 Experts/Consultants		
11/19/2021	MT Review and analyzed K Hov's second supplemental disclosure statement in conjunction with its responses to co-third-party defendant Renco's written discovery.	0.30 180.00/hr	54.00
	L310 Written Discovery		
	MT Review and analyzed K Hov's responses to co-third-party defendant Renco's written discovery, specifically responses to RFAs, RFPs, and NUIs (18 pgs).	0.70 180.00/hr	126.00
	L310 Written Discovery		
11/22/2021	SRG Reviewed plaintiff correspondence and request for information regarding client's written discovery propounded on plaintiff.	0.10 195.00/hr	19.50
	L310 Written Discovery		
	SRG Teleconference from K.Hov regarding expert mediation privileged discussion on claims.	0.30 195.00/hr	58.50
	L340 Expert Discovery		
	SRG Revise and supplement client's mandatory disclosure statement with new information provided by client and to supplement legal theories of defenses based on factual basis of project. 26 pages	0.80 195.00/hr	156.00
	L310 Written Discovery		
	SRG Reviewed additional project documents received from client in preparation for understanding of scope and to prepare relevant information for disclosure as required by Rules. (200+ pages)	1.10 195.00/hr	214.50
	L310 Written Discovery		
11/23/2021	KM Email correspondence to expert D. Ball and T. Bilyea re [REDACTED]	0.10 95.00/hr	9.50
	L130 Experts/Consultants		
	TLO Review, identify and prepare approximately 1000 pages of client job file for disclosure	1.10 95.00/hr	104.50
	L110 Fact Investigation/Development		
	MT Review and analyzed and drafted correspondence to/from K Hov counsel re: communication between experts in preparation of mediation.	0.10 180.00/hr	18.00
	L130 Experts/Consultants		

		<u>Hrs/Rate</u>	<u>Amount</u>
11/23/2021	MT	0.30 180.00/hr	54.00
	MT	1.00 180.00/hr	180.00
	SRG	0.20 195.00/hr	39.00
11/24/2021	MT	0.30 180.00/hr	54.00
	MT	0.80 180.00/hr	144.00
	MT	1.30 180.00/hr	234.00
	MT	1.40 180.00/hr	252.00
11/29/2021	MT	0.60 180.00/hr	108.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/29/2021	MT	Review and analyzed Plaintiff Gallery's responses to Renco's written discovery, specifically responses to non-uniform interrogatories.  L310 Written Discovery	1.00 180.00/hr  180.00
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.  L250 Other Written Motions and Submissions	0.30 180.00/hr  54.00
	SRG	Reviewed Mediator correspondence (x2) regarding settlement negotiations and procedure for mediation .2  L160 Settlement/Non-Binding ADR	0.20 195.00/hr  39.00
	SRG	Teleconference to Mediator L.Fleischman for mediation communciation and commencement of background discussions for settlement negotiations .  L160 Settlement/Non-Binding ADR	0.20 195.00/hr  39.00
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: liability exposure and settlement.  L130 Experts/Consultants	1.00 180.00/hr  180.00
12/2/2021	SRG	Teleconference with MC Consultants regarding cost of repair and issues for mediation memorandum and strategy.  L340 Expert Discovery	0.20 195.00/hr  39.00
	SRG	Teleconference with West Harrington regarding [REDACTED] [REDACTED]  L340 Expert Discovery	0.30 195.00/hr  58.50
	MT	Drafted correspondence to Khov counsel regarding expert discussion in preparation of mediation.  L160 Settlement/Non-Binding ADR	0.10 180.00/hr  18.00
	MT	Teleconference with adjuster Alexis to discuss upcoming mediation [REDACTED].  L160 Settlement/Non-Binding ADR	0.20 180.00/hr  36.00

		<u>Hrs/Rate</u>	<u>Amount</u>	
12/2/2021	MT	Teleconference with client to discuss [REDACTED] [REDACTED]	0.30 180.00/hr	54.00
		L160 Settlement/Non-Binding ADR		
	MT	Teleconference with mediator to discuss mediation on 12/30. L160 Settlement/Non-Binding ADR	0.50 180.00/hr	90.00
	MT	Drafted premediation report to carrier and drafted [REDACTED] [REDACTED]	2.40 180.00/hr	432.00
		L160 Settlement/Non-Binding ADR		
12/3/2021	SRG	Supplement and revise premediation report, including summary and impact of Plaintiff's expert opinions and cost of repair, K.Hov.'s expert's opinions, cost of repair, impact on client claims and defenses. 22 pages L160 Settlement/Non-Binding ADR	2.60 195.00/hr	507.00
	MT	Drafted premediation report to carrier to include [REDACTED] [REDACTED]	4.80 180.00/hr	864.00
		L160 Settlement/Non-Binding ADR		
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. L160 Settlement/Non-Binding ADR	0.50 180.00/hr	90.00
	MT	Drafted first part of mediation memorandum in preparation of mediation. L160 Settlement/Non-Binding ADR	0.70 180.00/hr	126.00
12/7/2021	SRG	Reviewed order regarding pending Motion for Summary Judgment. L240 Dispositive Motions	0.10 195.00/hr	19.50
	MT	Review and analyzed court order granting stipulation to extend plaintiff's amended response to K Hov MSJ.	0.10 180.00/hr	18.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L240 Dispositive Motions		
12/7/2021	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).	3.80 180.00/hr	684.00
	L160 Settlement/Non-Binding ADR		
12/8/2021	MT Proofread and revised mediation memorandum in preparation of mediation.	0.50 180.00/hr	90.00
	L160 Settlement/Non-Binding ADR		
12/9/2021	MT Prepared for K Hov expert conference call with desert vista conference call. Reviewed expert reports and cost of repair estimate, wrote down questions/issues to discuss.	0.40 180.00/hr	72.00
	L130 Experts/Consultants		
MT	Teleconference with our expert West Harrington following the conference with K hov's experts to discuss his initial findings [REDACTED]	0.50 180.00/hr	90.00
	L130 Experts/Consultants		
MT	Teleconference with expert West Harrington re: K Hov's expert conference call to discuss expert findings and [REDACTED]	0.60 180.00/hr	108.00
	L130 Experts/Consultants		
MT	Teleconference with Beazer's counsel and Beazer's experts, with our experts, to discuss and review and go over plaintiff's experts' findings and K hov's analysis and updated damages and cost of repair, and our expert's responses to their findings in preparation of mediation.	1.30 180.00/hr	234.00
	L130 Experts/Consultants		
12/10/2021	SRG Phone call from K.Hov regarding [REDACTED] dollar settlement demand.	0.20 195.00/hr	39.00
	L160 Settlement/Non-Binding ADR		
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

			<u>Hrs/Rate</u>	<u>Amount</u>
		L340 Expert Discovery		
12/10/2021	SRG	Communicate with Paul Frame and client regarding [REDACTED]	0.30 195.00/hr	58.50
		L160 Settlement/Non-Binding ADR		
	SRG	Phone call with W.Harrington regarding settlement demand in [REDACTED].	0.30 195.00/hr	58.50
		L340 Expert Discovery		
	SRG	Revise and supplement Confidential Mediation Memorandum to Mediator per order and in preparation for mediation appearance including: [REDACTED]	1.30 195.00/hr	253.50
		L160 Settlement/Non-Binding ADR		
	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.	0.30 180.00/hr	54.00
		L110 Fact Investigation/Development		
	MT	Drafted correspondence to adjuster Alexis re: settlement demand [REDACTED]	0.30 180.00/hr	54.00
		L160 Settlement/Non-Binding ADR		
	MT	Drafted correspondence to client re: settlement demand received from K Hov and [REDACTED].	0.30 180.00/hr	54.00
		L160 Settlement/Non-Binding ADR		
	MT	Review and analyzed K Hov's settlement demand letter in preparation of mediation.	0.30 180.00/hr	54.00
		L160 Settlement/Non-Binding ADR		
	MT	Review and analyzed relevant policy period, correspondence, settlement letters, and tender letters in preparation of mediation.	0.50 180.00/hr	90.00
		L120 Analysis/Strategy		
12/13/2021	MT	Review and analyzed and drafted correspondence to/from client's corporate counsel re: [REDACTED]	0.20 180.00/hr	36.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L120 Analysis/Strategy		
12/14/2021	MT Review and analyzed third-party co-defendant's mediation memorandum in preparation of mediation.	0.60 180.00/hr	108.00
	L160 Settlement/Non-Binding ADR		
	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 11 additional pages).	2.70 180.00/hr	486.00
	L160 Settlement/Non-Binding ADR		
12/15/2021	SRG Appear for expert call with West Harrington and adjuster. (NO CHARGE)	1.50 195.00/hr	NO CHARGE
	L340 Expert Discovery		
	SRG Revised liability analysis in mediator requested memo based on new information provided by K.Hov and demand.	0.30 195.00/hr	58.50
	L160 Settlement/Non-Binding ADR		
	MT Teleconference with mediator to discuss upcoming mediation re: each subcontractor.	0.20 180.00/hr	36.00
	L160 Settlement/Non-Binding ADR		
	MT Teleconference with adjuster Alexis Grant, expert West Harrington, and corporate counsel for client, Paul Frame to discuss [REDACTED]	1.70 180.00/hr	306.00
	L130 Experts/Consultants		
12/16/2021	SRG Corporate counsel phone call regarding [REDACTED]	0.40 195.00/hr	78.00
	L160 Settlement/Non-Binding ADR		
	MT Proofread and revised mediation memorandum before sending to mediator.	0.30 180.00/hr	54.00
	L160 Settlement/Non-Binding ADR		
	MT Review and analyzed excess insurance policies (4 policies total) provided by adjuster [REDACTED]	0.70 180.00/hr	126.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L120 Analysis/Strategy		
12/21/2021	MT Teleconference with adjuster Alexis to discuss [REDACTED].	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
	MT Teleconference with expert to discuss cost of repair estimate from [REDACTED].	0.30 180.00/hr	54.00
	L130 Experts/Consultants		
12/23/2021	MT 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.	0.30 180.00/hr	54.00
	L130 Experts/Consultants		
	MT Teleconference with expert West to discuss cost of repair estimate [REDACTED] in preparation of mediation and obtaining settlement authority from carrier.	0.50 180.00/hr	90.00
	L130 Experts/Consultants		
	MT Review and analyzed third-party co-defendant Custom Leasing Inc.'s Mediation Memorandum and exhibits (~80 pgs).	0.70 180.00/hr	126.00
	L160 Settlement/Non-Binding ADR		
	MT 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.	1.50 180.00/hr	270.00
	L160 Settlement/Non-Binding ADR		
12/27/2021	SRG Prepare to appear for mediation with Larry Fleischman ([REDACTED]) Include review of SBSA reports, Nautilus cost of repair, and K.Hov expert reports authored by Burt Howe.	4.10 195.00/hr	799.50
	L160 Settlement/Non-Binding ADR		
12/28/2021	SRG Phone call to K.Hov regarding mediation and settlement demand details.	0.30 195.00/hr	58.50

			<u>Hrs/Rate</u>	<u>Amount</u>
L160 Settlement/Non-Binding ADR				
12/28/2021	SRG	Reviewed and analyzed Third-Party Defendant LeBlanc Building Co., Inc.'s Mediation Memorandum. .3 9 pages	0.30 195.00/hr	58.50
L160 Settlement/Non-Binding ADR				
12/29/2021	SRG	Drafted adjuster correspondence and information for use during tomorrow's mediation.	0.10 195.00/hr	19.50
L110 Fact Investigation/Development				
	SRG	Phone call with opposing counsel H.Davies regarding mediation, demand, claims and other project general information.	0.20 195.00/hr	39.00
L160 Settlement/Non-Binding ADR				
	SRG	Phone call to client to confirm certain aspects of scope of work [REDACTED]	0.30 195.00/hr	58.50
L110 Fact Investigation/Development				
	SRG	Phone call with Larry Fleischman (mediator) regarding claims, demand, and negotiations. X2	0.50 195.00/hr	97.50
L160 Settlement/Non-Binding ADR				
12/30/2021	MT	Teleconference with expert West to discuss plaintiff's experts cost of repair estimate [REDACTED]	0.40 180.00/hr	72.00
L130 Experts/Consultants				
	SRG	Appear for mediation with Fleischman	6.50 195.00/hr	1,267.50
L160 Settlement/Non-Binding ADR				
For professional services rendered			116.70	\$21,117.00
Additional Charges :				
			<u>Qty</u>	
10/25/2021	TLO	Court Filing Fee, Form Set # 6217072	1	6.70
	TLO	Court Filing Fee, Form Set # 6217136	1	6.70

			<u>Qty</u>	<u>Amount</u>
10/25/2021	TLO	Court Filing Fee, Form Set # 6217137	1	6.70
11/1/2021	TLO	Court Filing Fee, Form Set 6238746	1	6.70
	TLO	Court Filing Fee, Form Set 6239000	1	6.70
	TLO	Court Filing Fee, Form Set 6238744	1	259.05
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
12/9/2021	TLO	Expense for professional services provided by Core Consulting Group, Invoice no. 215938	1	140.00
Total costs				<u>\$765.88</u>
Total amount of this bill				<u>\$21,882.88</u>
Balance due				<u><u>\$21,882.88</u></u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Shannon Huff- Partner	35.60	195.00	\$6,942.00
Shannon Huff- Partner	1.50	0.00	\$0.00
Derick Lysene	7.60	180.00	\$1,368.00
Mohamad Tokko	70.20	180.00	\$12,636.00
Kristin Matysek	0.10	95.00	\$9.50
Tracy O'Brien - Paralegal	1.70	95.00	\$161.50

Total fees to date (inclusive of this bill)      \$21,117.00

Total costs to date (inclusive of this bill)      \$765.88

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

April 26, 2022

Invoice submitted to:

National Claims Service  
Kristin Childress

In Reference To: Case Name: Desert Vista adv. K. Hovnanian  
Project Name: The Gallery in Scottsdale  
Claim Number: 48576  
Date of Loss:  
Cause Number:  
Attn: Kristin Childress

Invoice # 51262

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>	
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, [REDACTED]	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, [REDACTED]	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		

		<u>Hrs/Rate</u>	<u>Amount</u>
1/3/2022	SRG Supplement client correspondence regarding post mediation a [REDACTED] [REDACTED] L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed mediator correspondence, summary of settlement negotiations, various construction, legal and additional insured issues for discussion. L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
1/4/2022	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 [REDACTED] L120 Analysis/Strategy	0.60 180.00/hr	108.00
	MT Drafted updated liability analysis status report to carrier outlining [REDACTED] [REDACTED] L120 Analysis/Strategy	2.60 180.00/hr	468.00
	SRG Drafted mediator response regarding mediation and settlement negotiations. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Drafted A.Grant correspondence and request for information for [REDACTED] L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed A.Grant correspondence and additional request [REDACTED] [REDACTED] L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed mediator correspondence regarding mediation and settlement negotiations. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed A.Grant correspondence and request for information for [REDACTED] [REDACTED] L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	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

		<u>Hrs/Rate</u>	<u>Amount</u>
	L150 Budgeting		
1/5/2022	MT Teleconference with expert, West to discuss [REDACTED] [REDACTED]	0.50 180.00/hr	90.00
	L130 Experts/Consultants		
MT	Drafted, revised, and proofread updated liability report by making additions re: [REDACTED] [REDACTED]	0.70 180.00/hr	126.00
	L120 Analysis/Strategy		
SRG	Drafted adjuster regarding [REDACTED] [REDACTED]	0.10 195.00/hr	19.50
	L120 Analysis/Strategy		
SRG	Appear for mandatory meeting with Charles Wamsley of NCS at his [REDACTED]	0.60 195.00/hr	117.00
	L120 Analysis/Strategy		
1/6/2022	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 Alexis in email dated 1.4.22.	2.30 180.00/hr	414.00
	L310 Written Discovery		
SRG	Drafted A. Grant response to request for information regarding [REDACTED] [REDACTED]	0.20 195.00/hr	39.00
	L120 Analysis/Strategy		
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		
SRG	Reviewed and analyzed Plaintiff correspondence, 12th supplemental disclosure, and produced documents and photos for further handling (100+pages)	0.40 195.00/hr	78.00
	L310 Written Discovery		
1/7/2022	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

		<u>Hrs/Rate</u>	<u>Amount</u>
	L310 Written Discovery		
1/7/2022 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 on 1/4/22 from adjuster Alexis.	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	Conference call with West Harrington regarding allegations, defenses, and preparation and strategy for disclose of Dv's expert reports.	0.90 195.00/hr	175.50
	L340 Expert Discovery		
SRG	Supplement and revise adjuster's liability analysis report with [REDACTED]	1.70 195.00/hr	331.50
	L120 Analysis/Strategy		
1/10/2022 MT	Teleconference with client to discuss [REDACTED]	0.30 180.00/hr	54.00
	L110 Fact Investigation/Development		
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 Alexis on 1/4/22.	2.50 180.00/hr	450.00
	L310 Written Discovery		
SRG	Phone call from Mediator regarding settlement negotiations .1	0.10 195.00/hr	19.50
	L160 Settlement/Non-Binding ADR		
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 from adjuster Alexis dated 1/4/2022.	2.30 180.00/hr	414.00
	L310 Written Discovery		

			<u>Hrs/Rate</u>	<u>Amount</u>
1/11/2022	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
1/13/2022	SRG	Reviewed and analyzed adjuster correspondence regarding request for information [REDACTED]  L120 Analysis/Strategy	0.10 195.00/hr	19.50
1/20/2022	MT	Drafted correspondence to expert West at Harrington Cons. re: emergency inspection and roof leak.  L130 Experts/Consultants	0.10 180.00/hr	18.00
	MT	Drafted correspondence to carrier to provide information on new roof leak identified by Plaintiff, [REDACTED] [REDACTED]  L120 Analysis/Strategy	0.20 180.00/hr	36.00
	MT	Drafted correspondence to client to provide information on new roof leak identified by Plaintiff, [REDACTED] [REDACTED]  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	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.	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L250 Other Written Motions and Submissions		
1/20/2022	SRG	Phone call to Mediator Fleischman regarding impact of Stipulation and Order for Dismissal of Plaintiff's Claims and impact on client's claims.	0.20 195.00/hr	39.00
		L250 Other Written Motions and Submissions		
1/21/2022	MT	Review and analyzed and drafted correspondence to adjuster Alexis re: [REDACTED]	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	MT	Drafted correspondence to our expert West to discuss upcoming expert report disclosure and details of opinions and findings.	0.20 180.00/hr	36.00
		L130 Experts/Consultants		
	SRG	Reviewed correspondence and Notice of Settlement for Chas Roberts Air Conditioning, Inc.	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Reviewed all counsel correspondence regarding outstanding discovery and expert discovery for input.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
1/24/2022	SRG	Reviewed November 24 Court Order to response to adjuster request for information .1	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	SRG	Drafted adjuster Charles Wamsley response to request for information for case and other information for response.X2	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Reviewed adjuster Charles Wamsley request for information for case and other information for response.X2	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Drafted adjuster Charles Wamsley response to request for information for case and other information for response.X2	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	SRG	Reviewed adjuster Charles Wamsley request for information for case and other information for response.X2	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L110 Fact Investigation/Development		
1/25/2022	SRG	Review and analyze West Harrington draft expert report to [REDACTED] [REDACTED]	1.10 195.00/hr	214.50
		L340 Expert Discovery		
1/26/2022	MT	Review and analyzed court order granting dismissal of one defendant/third party plaintiff, K Hov companies of AZ.	0.10 180.00/hr	18.00
		L250 Other Written Motions and Submissions		
	SRG	Phone call with expert regarding responsive expert opinions and approach to defense report for overall strategy..6	0.60 195.00/hr	117.00
		L340 Expert Discovery		
1/27/2022	MT	Drafted correspondence to expert West Harrington discussing [REDACTED]	0.20 180.00/hr	36.00
		L130 Experts/Consultants		
	MT	Review and analyzed our expert, Harrington's expert report draft in preparation of disclosing, specifically [REDACTED]	0.50 180.00/hr	90.00
		L130 Experts/Consultants		
	SRG	Revise and supplement Plaintiff correspondence regarding inadequate notice of emergency leak and notice.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
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
		L160 Settlement/Non-Binding ADR		
	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	Expert phone call regarding strategy, opinions and expert developments.	0.40 195.00/hr	78.00
		L340 Expert Discovery		

		<u>Hrs/Rate</u>	<u>Amount</u>	
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 HCCI to discuss and ensure all appropriate documents are included in the reviewed section and to ensure final report analysis thorough to disclose in preparation of disclosing expert opinions.	0.40 180.00/hr	72.00
		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
		L310 Written Discovery		
	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		
	SRG	Reviewed and analyzed W.Harrington revised expert report and opinions to confirm revised report reflects attorney/expert strategy for defense and disclosure to all parties. (51 pages)	0.60 195.00/hr	117.00
		L340 Expert Discovery		
2/1/2022	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
		L240 Dispositive Motions		
	SRG	Drafted T.Fowler correspondence regarding expert discovery and request for input.	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		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
		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		
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		
2/18/2022	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
		L120 Analysis/Strategy		
	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>
2/28/2022	SRG	Drafted C.Wamsley response regarding case, [REDACTED]. [REDACTED]	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	MT	Drafted correspondence to our expert at Harrington Construction with K Hov's third supplemental disclosure and attachments of additional expert reports.	0.20 180.00/hr	36.00
		L130 Experts/Consultants		
	MT	Review and analyzed K Hov's third supplemental disclosure and attachments of expert defense report and cost of repair estimates (~50 pgs).	1.00 180.00/hr	180.00
		L310 Written Discovery		
3/3/2022	MT	Review and analyzed final version of stipulation to extend discovery and proposed order filed by K Hov.	0.10 180.00/hr	18.00
		L250 Other Written Motions and Submissions		
	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	SRG	Supplement and revise carrier correspondence regarding [REDACTED]. [REDACTED]	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Client phone call regarding notice of additional emergency inspections and water intrusion and impact on client claims/defenses.	0.30 195.00/hr	58.50
		L110 Fact Investigation/Development		
	SRG	Call from corporate counsel regarding [REDACTED]. [REDACTED]	0.30 195.00/hr	58.50
		L160 Settlement/Non-Binding ADR		
	MT	Review and analyzed and drafted correspondence to/from client re: [REDACTED]. [REDACTED]	0.10 180.00/hr	18.00
		L160 Settlement/Non-Binding ADR		
	MT	Drafted correspondence to adjuster re: K Hov's third supplemental disclosure statement [REDACTED]. [REDACTED]	0.20 180.00/hr	36.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L120 Analysis/Strategy		
3/4/2022	MT		
	Drafted correspondence to client re: K Hov's third supplemental disclosure statement [REDACTED]	0.20 180.00/hr	36.00
	L120 Analysis/Strategy		
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		
3/8/2022	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
	L240 Dispositive Motions		
	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		
	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.	1.20 180.00/hr	216.00
	L130 Experts/Consultants		
	MT		
	Drafted updated status report to carrier re: [REDACTED]	2.60 180.00/hr	468.00
	L120 Analysis/Strategy		
3/9/2022	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 [REDACTED]	0.20 195.00/hr	39.00
	L120 Analysis/Strategy		

		<u>Hrs/Rate</u>	<u>Amount</u>
3/9/2022	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.  L240 Dispositive Motions	0.30 195.00/hr	58.50
	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.  L240 Dispositive Motions	0.30 195.00/hr	58.50
	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.  L240 Dispositive Motions	0.30 195.00/hr	58.50
	SRG Phone call to expert to discuss K.Hov's new untimely produced expert opinions, cost of repair, and allocation of fault. (9 pages)  L340 Expert Discovery	0.30 195.00/hr	58.50
	SRG Phone call with Mediator regarding case proceedings, global resolution efforts, and expert discovery dispute due to KHOV untimely reports and opinions.  L340 Expert Discovery	0.30 195.00/hr	58.50
	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.  L240 Dispositive Motions	0.40 195.00/hr	78.00
	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.  L240 Dispositive Motions	0.60 195.00/hr	117.00
	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.  L240 Dispositive Motions	0.60 195.00/hr	117.00

			<u>Hrs/Rate</u>	<u>Amount</u>
3/9/2022	SRG	Reviewed and analyzed K.Hov's recent 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		
	MT	Drafted and revisions status report to carrier by drafting [REDACTED]	1.00 180.00/hr	180.00
		L120 Analysis/Strategy		
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
		L340 Expert Discovery		
	SRG	Phone call with corporation counsel regarding legal defenses [REDACTED]	0.20 195.00/hr	39.00
		L110 Fact Investigation/Development		
	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 defenses [REDACTED]	0.50 195.00/hr	97.50
		L110 Fact Investigation/Development		
	SRG	Supplement and revise updated liability impact report regarding overall case proceedings but primarily [REDACTED]	1.80 195.00/hr	351.00
		L120 Analysis/Strategy		
3/11/2022	SRG	Drafted K.Hov meet and confer summary regarding Motion to Preclude expert opinions.	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L340 Expert Discovery		
3/11/2022	SRG	Reviewed expert correspondence and request for information related to K.Hov untimely expert reports and allocation.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Reviewed K.Hov correspondence regarding withdrawal of untimely reports.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Phone call to Amy Wilkens requesting withdrawal of expert reports and satisfying meet and confer requirement prior to filing motion to preclude opinions.	0.40 195.00/hr	78.00
		L130 Experts/Consultants		
	SRG	Phone call with client to further discuss expres [REDACTED]	0.40 195.00/hr	78.00
		L240 Dispositive Motions		
3/15/2022	SRG	Phone call to adjuster regarding [REDACTED].	0.10 195.00/hr	19.50
		L150 Budgeting		
	SRG	Drafted adjuster request for authority on m [REDACTED]	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed adjuster correspondence [REDACTED]	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Client phone call regarding [REDACTED].	0.20 195.00/hr	39.00
		L250 Other Written Motions and Submissions		
	SRG	Phone call to West regarding investigation into new opinions.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	MT	Review and analyzed court order granting stipulation re discovery deadlines.	0.10 180.00/hr	18.00
		L120 Analysis/Strategy		

		<u>Hrs/Rate</u>	<u>Amount</u>
3/15/2022	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
3/16/2022	SRG	Reviewed Order resetting Trial Setting Conference.  L230 Court Mandated Conferences	0.10 195.00/hr  19.50
	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
	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
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
3/18/2022	SRG	Phone call with West (expert) regarding general defense strategy and [REDACTED]  L340 Expert Discovery	0.50 195.00/hr  97.50
	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.  L120 Analysis/Strategy	0.20 180.00/hr  36.00
	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.  L120 Analysis/Strategy	0.20 180.00/hr  36.00
	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.  L120 Analysis/Strategy	0.20 180.00/hr  36.00



		<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		
3/23/2022	MT	Review and analyzed and drafted correspondence to/from our expert, Harrington regarding rebuttal deadlines, our objection to K Hov's new expert reports and legal strategy in preclusion, and disclosure of additional expert reports.	0.20 180.00/hr	36.00
		L130 Experts/Consultants		
	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		
	MT	Review and analyzed recent disclosure statement of Plaintiff, K Hov, and Desert Vista, and written discovery responses from those parties in preparation of drafting notice of nonparty at fault.	0.50 180.00/hr	90.00
		L250 Other Written Motions and Submissions		
	MT	Drafted notice of nonparty at fault for client to ensure desert vista properly defended [REDACTED]	0.70 180.00/hr	126.00
		L250 Other Written Motions and Submissions		
3/24/2022	MT	Drafted and finalized notice of nonparty at fault in preparation of filing today for due date. Included additional parties that were previously dismissed from the suit and/or named as a witness but not named as a party.	0.30 180.00/hr	54.00
		L250 Other Written Motions and Submissions		
3/25/2022	SRG	Supplement and revise notice of non parties at fault to include additional K.Hov entities not named in actual litigation.	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	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

		<u>Hrs/Rate</u>	<u>Amount</u>
	L310 Written Discovery		
3/25/2022	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		
MT	Teleconference with our expert, Harrington to discuss rebuttal report draft and discuss cost of repair estimate [REDACTED]	0.50 180.00/hr	90.00
	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		
3/28/2022	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 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		
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		
MT	Review and analyzed additional expert reports disclosed by other third-party defendants and K Hov in preparation of rebuttal reports with our experts.	0.60 180.00/hr	108.00
	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	0.60 180.00/hr	108.00

Hrs/Rate      Amount

these findings in joint motion to preclude K Hov new expert opinions.

L350 Discovery Motions

3/28/2022	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

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

	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 expert attendance.	0.10 180.00/hr	18.00
--	----	--	-------------------	-------

L120 Analysis/Strategy

For professional services rendered	<u>70.20</u>	<u>\$13,065.00</u>
------------------------------------	--------------	--------------------

Additional Charges :

Qty

1/6/2022	TLO	Expense for mediation services provided by The Fleischman Law Firm, Invoice no. 4517-01	1	104.17
----------	-----	---	---	--------

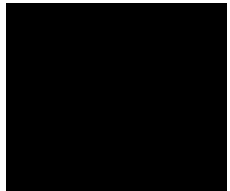
Total costs		<u>\$104.17</u>
-------------	--	-----------------

Total amount of this bill		<u>\$13,169.17</u>
---------------------------	--	--------------------

Previous balance

3/17/2022 Payment received from NCS - thank you. Check No. 49934

Total payments and adjustments



Balance due

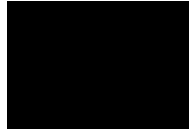
Amount

\$13,957.67

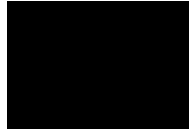
Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Rina Rai - Partner	0.70	195.00	\$136.50
Shannon Huff- Partner	27.90	195.00	\$5,440.50
Mohamad Tokko	41.60	180.00	\$7,488.00

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

July 28, 2022

Invoice submitted to:

National Claims Service  
Mary Barrett

In Reference To: Case Name: Desert Vista adv. K. Hovnanian  
Project Name: The Gallery in Scottsdale  
Claim Number: 48576  
Date of Loss:  
Cause Number:  
Attn: Mary Barrett

Invoice # 51808

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
4/1/2022 MT	Drafted impact report to carrier Alexis, re: inspection today for leaks and discussed [REDACTED]	0.50 180.00/hr	90.00
	L120 Analysis/Strategy		
SRG	Supplement carrier correspondence regarding today's emergency repair and request for authority [REDACTED]	0.10 195.00/hr	19.50
	L240 Dispositive Motions		
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.	0.10 180.00/hr	18.00
	L250 Other Written Motions and Submissions		
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		

		<u>Hrs/Rate</u>	<u>Amount</u>	
4/4/2022	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 KHOV Rule 408 Settlement communication.	0.10 195.00/hr	19.50
		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	Drafted Mediator Fleischman correspondence regarding anticipated Motion for Summary Judgment regarding Express Indemnity. (x3)	0.20 195.00/hr	39.00
		L240 Dispositive Motions		
	SRG	Phone call to Mediator Lawrence Fleischman regarding settlement negotiations.	0.30 195.00/hr	58.50
		L160 Settlement/Non-Binding ADR		
4/8/2022	SRG	Phone call with mediator Fleischman continuing settlement negotiations and raising defenses and issues for future motion practice.	0.20 195.00/hr	39.00
		L160 Settlement/Non-Binding ADR		
	SRG	Phone call with K.Hov counsel Amy regarding continuing settlement negotiations.	0.50 195.00/hr	97.50
		L160 Settlement/Non-Binding ADR		
4/11/2022	MT	Review and analyzed and drafted correspondence to/from adjuster re: authority to [REDACTED]	0.20 180.00/hr	36.00
		L120 Analysis/Strategy		
	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.	0.60 180.00/hr	108.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L310 Written Discovery		
4/11/2022	MT Drafted second 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.	1.20 180.00/hr	216.00
	L310 Written Discovery		
4/13/2022	MT Review and analyzed court order dismissing third-party defendant Chas Roberts A/C.	0.10 180.00/hr	18.00
	L250 Other Written Motions and Submissions		
	SRG Reviewed and analyzed Order of Dismissal of Chas Roberts with prejudice.	0.10 195.00/hr	19.50
	L250 Other Written Motions and Submissions		
4/14/2022	DL Review and analyze reservation of rights letter from Jeb McWilliam.	0.10 180.00/hr	18.00
	L110 Fact Investigation/Development		
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.	0.50 180.00/hr	90.00
	L350 Discovery Motions		
4/20/2022	SRG Drafted adjuster response regarding [REDACTED]	0.10 195.00/hr	19.50
	L110 Fact Investigation/Development		
	SRG Reviewed adjuster Kristin Childress correspondence regarding [REDACTED]	0.10 195.00/hr	19.50
	L110 Fact Investigation/Development		
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		

		<u>Hrs/Rate</u>	<u>Amount</u>
4/25/2022	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.  L350 Discovery Motions	0.60 180.00/hr	108.00
	SRG Revise and supplement arguments within Reply to Motion to Preclude Untimely Expert Reports and Opinions. (12 pages)  L210 Pleadings	2.10 195.00/hr	409.50
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.  L350 Discovery Motions	0.50 180.00/hr	90.00
4/28/2022	TLO Identify and prepare exhibits to Reply in Support of Motion to Preclude Untimely Reports and Opinions  L210 Pleadings	0.10 95.00/hr	9.50
	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.  L310 Written Discovery	0.20 180.00/hr	36.00
	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.  L120 Analysis/Strategy	0.30 180.00/hr	54.00
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

		<u>Hrs/Rate</u>	<u>Amount</u>	
5/3/2022	MT	Drafted correspondence to our expert, West Harrington re: plaintiff's 13th supp disclosure and exhibits, including expert rebuttal reports to prepare for rebuttal expert opinions.	0.20 180.00/hr	36.00
		L130 Experts/Consultants		
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.	0.20 180.00/hr	36.00
		L250 Other Written Motions and Submissions		
5/6/2022	SRG	Drafted Court response to request for informaiton on pending motion to preclude KHov opinions.	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed and analyzed D.Wilinchek correspondence regarding oral argument and pending motion to preclude.	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed and analyzed Court correspondence regarding oral argument on pending Motion to Preclude Khov's untimely opinions.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Reviewed and analyzed Khov response to Court request for information regarding oral argument on pending Motion to Preclude Khov's untimely opinions.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Reviewed and analyzed L.Fink correspondence regarding pending Motion to Preclude.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	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
		L120 Analysis/Strategy		
	MT	Drafted impact status report to carrier providing civil proceeding update and analysis. [REDACTED]	3.60 180.00/hr	648.00
		[REDACTED]		
		L120 Analysis/Strategy		

		<u>Hrs/Rate</u>	<u>Amount</u>
5/9/2022	SRG Drafted adjuster response to request for information. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG Reviewed adjuster correspondence and notice of new assigned adjuster for further handling and request for case information. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG Reviewed file to respond to new adjuster request for information. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed Penny Manship correspondence regarding pending Motion to Preclude. L210 Pleadings	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed counsel A.Hough correspondence regarding pending Motion to Preclude and oral argument. L210 Pleadings	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed counsel T.Wales correspondence regarding pending Motion to Preclude and oral argument. L210 Pleadings	0.10 195.00/hr	19.50
	SRG Reviewed and analyzed counsel S.Best correspondence regarding pending Motion to Preclude and oral argument. L210 Pleadings	0.10 195.00/hr	19.50
	SRG Reviewed judicial assistant correspondence regarding oral argument on client's pending motion. L250 Other Written Motions and Submissions	0.10 195.00/hr	19.50
	SRG Reviewed Liberty Constructors correspondence regarding pending Motion to Preclude. L250 Other Written Motions and Submissions	0.10 195.00/hr	19.50
	SRG Reviewed counsel S.Best correspondence regarding pending Motion to Preclude. L250 Other Written Motions and Submissions	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
5/9/2022	DL	Draft correspondence to adjuster re status of case and MSJ. L110 Fact Investigation/Development	0.10 180.00/hr	18.00
	DL	Review and analyze correspondence from adjuster re case status. L110 Fact Investigation/Development	0.10 180.00/hr	18.00
	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. L250 Other Written Motions and Submissions	0.10 180.00/hr	18.00
	MT	Review and analyzed Court Order granting stipulation for extension of deadline for plaintiff's experts' rebuttal opinions. L250 Other Written Motions and Submissions	0.10 180.00/hr	18.00
5/11/2022	SRG	Reviewed and analyzed correspondence from Plaintiff Penny Manship regarding pending Motion to Preclude. L210 Pleadings	0.10 195.00/hr	19.50
	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. L240 Dispositive Motions	0.10 195.00/hr	19.50
5/12/2022	SRG	Drafted adjuster response to request for information on case strategy. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed and analyzed correspondence from adjuster on case strategy. L120 Analysis/Strategy	0.10 195.00/hr	19.50
	SRG	Drafted Judicial Assistant correspondence and response to request for information on pending Motion to Preclude file on behalf of client. L210 Pleadings	0.10 195.00/hr	19.50
	SRG	Reviewed Judicial Assistant correspondence and request for information on pending Motion to Preclude file on behalf of client. L210 Pleadings	0.10 195.00/hr	19.50
	SRG	Reviewed S.Best response to Court requested information on pending Motion to Preclude.	0.10 195.00/hr	19.50

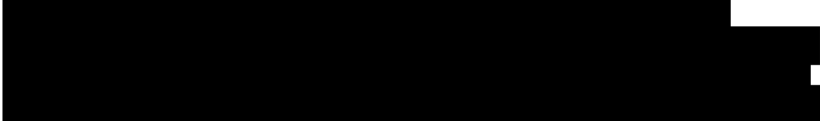
			<u>Hrs/Rate</u>	<u>Amount</u>
		L210 Pleadings		
5/13/2022	SRG	Conference call with Mary Barrett regarding case strategy and developments.	0.20 195.00/hr	39.00
		L120 Analysis/Strategy		
	MT	Teleconference with experts at West Harrington to discuss plaintiff's recently disclosed rebuttal expert reports from their experts SBSA and Nautilus addressing other subs' expert reports and Khov's supp new expert reports to determine impact on our defense and expert strategy.	0.70 180.00/hr	126.00
		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 Mary re: Oral Argument on our motion to preclude Khov's new expert reports a [REDACTED]	0.30 180.00/hr	54.00
		L350 Discovery Motions		
5/19/2022	SRG	Drafted adjuster correspondence regarding Motion to Preclude ruling.	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Reviewed and analyzed adjuster correspondence regarding Motion to Preclude ruling.	0.10 195.00/hr	19.50
		L210 Pleadings		
	SRG	Revise and supplement defense impact report based on status of various filings, pleadings, expert rebuttal opinions, and liability analysis. [REDACTED]	1.10 195.00/hr	214.50
		L150 Budgeting		
	MT	Review and analyzed Plaintiff's supplemental expert reports in preparation of my teleconference with our expert West Harrington to determine [REDACTED] a [REDACTED]	0.50 180.00/hr	90.00
		L130 Experts/Consultants		
	MT	Teleconference with our expert West Harrington to discuss and go over plaintiff's six (6) supplemental expert reports and discussed analysis and impact on defense and whether our expert will need to rebut or opine. Discussed and analyzed [REDACTED]	1.40 180.00/hr	252.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L130 Experts/Consultants		
5/20/2022	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 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
	L340 Expert Discovery		
	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		

		<u>Hrs/Rate</u>	<u>Amount</u>
5/20/2022	SRG Revise and supplement client impact report, including liability analysis and impact from Plaintiff's rebuttal reports, update on pending Motion to Preclude, and other discovery action tasks. 12 pages  L110 Fact Investigation/Development	1.10 195.00/hr	214.50
5/23/2022	SRG Drafted corporate counsel and client update on mediation and settlement demands.  L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG Reviewed P.Frame correspondence regarding pending motion and oral argument.  L210 Pleadings	0.10 195.00/hr	19.50
	SRG Reviewed Paul Frame, corporate counsel, correspondence regarding impact of pending Motion to Preclude.  L210 Pleadings	0.10 195.00/hr	19.50
	SRG Drafted client correspondence regarding deposition testimony.  L330 Depositions	0.10 195.00/hr	19.50
	SRG Reviewed A.Wilkens correspondence regarding client and expert testimony.  L330 Depositions	0.10 195.00/hr	19.50
	SRG Drafted Wilkens correspondence regarding expert discovery of Harrington and clarification of fact deposition.  L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG Reviewed W.Harrington correspondence regarding expert discovery.  L340 Expert Discovery	0.10 195.00/hr	19.50
	SRG Drafted carrier update regarding mediation, settlement update, and discovery stipulation.  L160 Settlement/Non-Binding ADR	0.20 195.00/hr	39.00
	SRG Phone call to client regarding deposition testimony, discovery and mediation.  L330 Depositions	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
5/23/2022	SRG	Phone call to expert regarding expert discovery and testimony. L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG	Phone call to Wilkens regarding clarification on mediation and discovery issues. L340 Expert Discovery	0.20 195.00/hr	39.00
	SRG	Phone call with P.Frame regarding [REDACTED] L210 Pleadings	0.30 195.00/hr	58.50
	SRG	Phone call to mediator L.Fleischman regarding expert discovery, pending motion, and continued settlement negotiations. (x2) L160 Settlement/Non-Binding ADR	0.40 195.00/hr	78.00
5/24/2022	SRG	Reviewed adjuster correspondence regarding mediation and [REDACTED] L120 Analysis/Strategy	0.10 195.00/hr	19.50
	SRG	Drafted adjuster response regarding mediation, [REDACTED]. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
	SRG	Drafted all counsel correspondence regarding discovery and mediation. L160 Settlement/Non-Binding ADR	0.10 195.00/hr	19.50
5/25/2022	SRG	Reviewed J.Boblick input on mediation and discovery issues. L110 Fact Investigation/Development	0.10 195.00/hr	19.50
	SRG	Reviewed P.Manship request for various discovery and input on mediation. L310 Written Discovery	0.10 195.00/hr	19.50
	SRG	Phone call with KHOV regarding mediation and ongoing discovery issues. L340 Expert Discovery	0.20 195.00/hr	39.00
5/27/2022	SRG	Reviewed Penny Manship correspondence regarding mediation and trial setting conference.	0.10 195.00/hr	19.50

		<u>Hrs/Rate</u>	<u>Amount</u>
	L160 Settlement/Non-Binding ADR		
5/27/2022	SRG Reviewed Amy Wilkens correspondence regarding oral argument on pending Motion to Preclude.	0.10 195.00/hr	19.50
	L240 Dispositive Motions		
6/1/2022	MT Review and analyzed prior supplemental disclosure statement, plaintiff's supplemental disclosure statement, and our two excess liability policies in preparation of drafting second supplemental disclosure statement disclosing other policies and lay witnesses.	0.50 180.00/hr	90.00
	L310 Written Discovery		
MT	Drafted second supplemental disclosure statement to disclosure client's two excess liability policies as requested by Khov and drafted additional lay witnesses as identified and disclosed by other parties.	1.00 180.00/hr	180.00
	L310 Written Discovery		
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. x2	0.20 195.00/hr	39.00
	L110 Fact Investigation/Development		
SRG	Phone call with C.Peterson regarding expert discovery and defense strategy.	0.20 195.00/hr	39.00
	L340 Expert Discovery		
SRG	Phone call with Amy Wilkens of KHOV regarding mediation and request for information on excess insurance.	0.30 195.00/hr	58.50
	L160 Settlement/Non-Binding ADR		
SRG	Revise and supplement client's supplemental disclosure statement regarding additional legal theories of defense, excess insurance policy information, and lay witnesses for trial. 27 pages	0.60 195.00/hr	117.00
	L310 Written Discovery		
6/2/2022	MT Drafted supplemental disclosure statement and made final revisions to the factual analysis in distinguishing the Khov entities in preparation of disclosure of insurance policies and mediation. Drafted additional defenses to protect client interest.	0.60 180.00/hr	108.00
	L310 Written Discovery		

		<u>Hrs/Rate</u>	<u>Amount</u>	
6/2/2022	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.	1.30 180.00/hr	234.00
		L160 Settlement/Non-Binding ADR		
	MT	Drafted second updated pre-mediation report to carrier as requested by adjuster in preparation of mediation, including full analysis of 	4.70 180.00/hr	846.00
		L160 Settlement/Non-Binding ADR		
	SRG	Received KHOV correspondence regarding 2nd mediation and demand.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed adjuster correspondence regarding mediation, settlement, and liability. (x2).	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Phone call from A.Wilkens regarding mediation and settlement authority.	0.20 195.00/hr	39.00
		L160 Settlement/Non-Binding ADR		
	SRG	Drafted adjusters correspondence regarding mediation, settlement, and liability. (x2).	0.20 195.00/hr	39.00
		L160 Settlement/Non-Binding ADR		
	SRG	Expert phone call regarding updates in liability exposure and mediation.	0.40 195.00/hr	78.00
		L340 Expert Discovery		
6/3/2022	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
		L250 Other Written Motions and Submissions		
6/6/2022	SRG	Phone call with expert in preparation for mediation and discussion of liability analysis and defenses.	0.30 195.00/hr	58.50

		<u>Hrs/Rate</u>	<u>Amount</u>
	L160 Settlement/Non-Binding ADR		
6/7/2022 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		
SRG	Phone call from Plaintiff regarding new emergency leaks and need for repairs.	0.10 195.00/hr	19.50
	L340 Expert Discovery		
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		
SRG	Reviewed Judicial Assistant correspondence and request for additional briefing on pending Motion to Preclude.	0.10 195.00/hr	19.50
	L250 Other Written Motions and Submissions		
SRG	Reviewed and analyzed adjuster correspondence and attachments regarding emergency repairs and supporting expert invoices and expert reports. .4	0.40 195.00/hr	78.00
	L340 Expert Discovery		
SRG	Phone call to expert regarding request for informaiton as required by Judge Cooper for supplemental briefing on Motion to Preclude.	0.40 195.00/hr	78.00
	L340 Expert Discovery		
SRG	Appear for oral argument on pending Motion to Preclude before Judge Cooper.	0.50 195.00/hr	97.50
	L250 Other Written Motions and Submissions		
6/13/2022 SRG	Reviewed Court Order and Minute Entry on Motion to Preclude and Supplemental Briefing.	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L250 Other Written Motions and Submissions		
6/13/2022	SRG	Phone call from K.Hov counsel regarding request for expert discovery and production of experts job file.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	SRG	Phone call to expert regarding production of expert job file.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
	SRG	Reviewed and analyzed settlement demand received from Khov to client [REDACTED]	0.30 195.00/hr	58.50
		L160 Settlement/Non-Binding ADR		
	SRG	Analyze and develop strategy for supplemental briefing on Motion to Preclude Khov's opinions that add millions in damages to case.	0.40 195.00/hr	78.00
		L210 Pleadings		
	SRG	Revise and supplement pre-mediation report with update on Motion to Preclude and oral argument, additional supplemental briefing requested by Court, impact on Mediation, and Settlement Demand [REDACTED]	1.80 195.00/hr	351.00
		L160 Settlement/Non-Binding ADR		
6/14/2022	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		
	SRG	Reviewed corporate counsel request for information on oral argument and pending Motion to Preclude.	0.10 195.00/hr	19.50
		L250 Other Written Motions and Submissions		
	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	Darted KHOV regarding requested expert discovery.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Drafted corporate counsel response, including Minute Entry, on Judges request for supplemental briefing and request for information on pending Motion.	0.20 195.00/hr	39.00

			<u>Hrs/Rate</u>	<u>Amount</u>
		L250 Other Written Motions and Submissions		
6/15/2022	SRG	Reviewed Fleischman correspondence regarding mandatory premeditation memo and requested content.	0.20 195.00/hr	39.00
		L160 Settlement/Non-Binding ADR		
6/16/2022	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		
	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		
6/17/2022	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		
	SRG	Reviewed adjuster correspondence regarding pre-mediation and settlement authority discussions.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed and analyzed KHOV correspondence and request for information on supplemental briefing.	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L210 Pleadings		
6/17/2022	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		
	SRG	Phone call from W.Harrington with information needed for supplemental briefing.	0.20 195.00/hr	39.00
		L340 Expert Discovery		
6/20/2022	MT	Review and analyzed court order to continue on dismissal calendar as to defendant custom leasing only.	0.10 180.00/hr	18.00
		L250 Other Written Motions and Submissions		
	MT	Drafted correspondence to judicial assistant re: supplemental documents to motion to preclude in under advisement ruling in preparation of compliance of court order.	0.10 180.00/hr	18.00
		L350 Discovery Motions		
	MT	Review and analyzed and drafted correspondence to/from khov's counsel re extension of court order to provide spreadsheet of issues in motion to preclude of new expert opinions.	0.20 180.00/hr	36.00
		L350 Discovery Motions		
	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 and made revisions to include subcontractor allocation percentages in khov's supp report, and cleaned up other columns for the judge.	1.00 180.00/hr	180.00
		L350 Discovery Motions		
	MT	Drafted joint timeline document as ordered by the court in under advisement ruling in order to make a ruling on our motion to preclude Khov's expert opinions. Reviewed pleadings and emails to create timeline.	1.20 180.00/hr	216.00
		L350 Discovery Motions		
	SRG	Drafted Plaintiff response regarding procedure and expert discovery and depositions.	0.10 195.00/hr	19.50
		L150 Budgeting		
	SRG	Drafted pleading for filing for supplemental briefing to extend filing date.	0.10 195.00/hr	19.50

			<u>Hrs/Rate</u>	<u>Amount</u>
		L210 Pleadings		
6/20/2022	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
		L250 Other Written Motions and Submissions		
	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.	1.10 195.00/hr	214.50
		L210 Pleadings		
6/21/2022	SRG	Drafted expert West Harrington correspondence regarding mediation and strategy.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Reviewed and analyzed J.Boblick correspondence regarding scope and procedure for expert discovery and depositions.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
	SRG	Reviewed and analyzed expert West Harrington Correspondence regarding mediation and strategy.	0.10 195.00/hr	19.50
		L340 Expert Discovery		
6/22/2022	SRG	Drafted M.Barrett correspondence regarding mediation and settlement discussions.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Reviewed M.Barrett correspondence and request for information for mediation.	0.10 195.00/hr	19.50
		L160 Settlement/Non-Binding ADR		
	SRG	Phone call to M.Barrett responding to request for information for mediation, strategy, and settlement authority. .x2	0.40 195.00/hr	78.00
		L160 Settlement/Non-Binding ADR		
6/23/2022	MT	Drafted correspondence to carrier regarding authority to attend mediation [REDACTED]	0.20 180.00/hr	36.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L160 Settlement/Non-Binding ADR		
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.	1.20 180.00/hr	216.00
	L350 Discovery Motions		
SRG	Drafted adjuster regarding expert premediation discussions and strategy.	0.10 195.00/hr	19.50
	L340 Expert Discovery		
SRG	Reviewed W.Harrington correspondence regarding mediation and expert discovery.	0.10 195.00/hr	19.50
	L340 Expert Discovery		
SRG	Phone call from W.Harrington regarding anticipated deposition testimony.	0.20 195.00/hr	39.00
	L330 Depositions		
6/24/2022 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.	0.70 180.00/hr	126.00
	L160 Settlement/Non-Binding ADR		
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 (29 pgs total).	3.20 180.00/hr	576.00
	L160 Settlement/Non-Binding ADR		
SRG	Drafted Supplemental Briefing to Motion to Preclude as required by June 10 Court Order and Declaration of West Harrington. 8 pages plus exhibits	1.70 195.00/hr	331.50
	L340 Expert Discovery		
6/27/2022 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.	0.50 180.00/hr	90.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	L160 Settlement/Non-Binding ADR		
6/27/2022	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
	L350 Discovery Motions		
	SRG Phone call with expert regarding mediation and strategy.	0.30 195.00/hr	58.50
	L340 Expert Discovery		
6/28/2022	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 the parties' stipulation to amend order re additional discovery while the parties participate in another mediation.	0.20 180.00/hr	36.00
	L250 Other Written Motions and Submissions		
	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.	1.00 180.00/hr	180.00
	L350 Discovery Motions		
	SRG Reviewed and analyzed court order granting Order to Dismiss Third-Party Defendant Gothic Landscaping, Inc. only.	0.10 195.00/hr	19.50
	L250 Other Written Motions and Submissions		
	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 Appear for pre-mediation conference with KHOV.	0.50 195.00/hr	97.50
	L160 Settlement/Non-Binding ADR		
6/29/2022	MT Drafted attachment to affidavit for our client's expert Harrington Co to include information to support affidavit and supplemental briefing as ordered by the court under advisement ruling in preparation of ruling	0.70 180.00/hr	126.00

Hrs/Rate      Amount

on our motion to preclude khov's untimely expert reports.

L350 Discovery Motions

6/29/2022	SRG	Review expert file and reports to prepare for carrier meeting with expert regarding liability and actual exposure for evaluation of defenses.	0.40	78.00
			195.00/hr	

L120 Analysis/Strategy

	SRG	Participate in expert conference with West Harrington to address onsite defects, failure to comply with plans/specs, and liability discussion for mediation.	0.50	97.50
			195.00/hr	

L340 Expert Discovery

6/30/2022	SRG	Phone call to Lou of KHOV regarding status of supplemental briefing on motion to preclude as required by court.	0.20	39.00
			195.00/hr	

L210 Pleadings

For professional services rendered	77.20	\$14,388.50
------------------------------------	-------	-------------

Additional Charges :

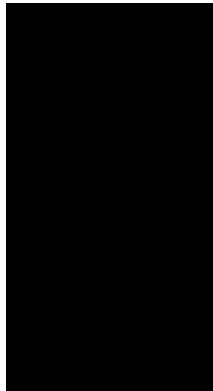
Qty

3/22/2022	TLO	Court Filing Fee, Form Set #6646832	1	6.70
3/24/2022	TLO	Court Filing Fee, Form Set #6656138	1	6.70
3/29/2022	TLO	Court Filing Fee, Form Set #6669548	1	6.70

Total costs		\$20.10
-------------	--	---------

Total amount of this bill		\$14,408.60
---------------------------	--	-------------

Previous balance



6/9/2022 Payment received from NCS - thank you. Check No. 52961  
 6/9/2022 Write off for invoice no. 50691  
 6/14/2022 Payment received from Venture Underwriters - thank you. Check No. 53339  
 6/16/2022 Write off for invoice no. 51262

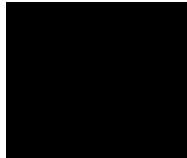
Total payments and adjustments

Balance due

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Shannon Huff- Partner	33.40	195.00	\$6,513.00
Derick Lysene	0.30	180.00	\$54.00
Mohamad Tokko	43.40	180.00	\$7,812.00
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)



# INVOICE

Invoice # 53093  
Date: 10/25/2022  
Due On: 11/24/2022

## Rai Duer, P.C.

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

National Claim Services-Oct/Jan/April/July

### 3499-B

### Desert Vista adv. K. Hovnanian

#### Services

Type	Date	Attorney	Notes	Quantity	Rate	Total
Service	07/01/2022	SGH	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	\$214.50
Service	07/05/2022	SGH	Reviewed and analyzed Court Order regarding modified scheduling order.	0.10	\$195.00	\$19.50
Service	07/06/2022	SGH	Phone call from W.Harrington regarding mediation strategy and stucco discussion.	0.20	\$195.00	\$39.00
Service	07/08/2022	MM	Continue review and analyzing documents, including parties' disclosure statements, expert reports, costs of repairs, motions re exclusion of cost of repair for mediation (316 pages, with Mary Barrett's authority).	1.20	\$180.00	\$216.00
Service	07/08/2022	MM	Draft correspondence to adjuster, Mary Barnett, re status of case, mediation, and settlement authority	0.10	\$180.00	\$18.00
Service	07/08/2022	SGH	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.	0.30	\$195.00	\$58.50

Service	07/08/2022	SGH	Reviewed Court Order regarding trial setting conference..1	0.10	\$195.00	\$19.50
Service	07/08/2022	SGH	Phone call with L.Horowitz regarding mediation and other case proceedings to assist with settlement.	0.60	\$195.00	\$117.00
Service	07/08/2022	SGH	Phone call with West Harrington to prepare for mediation [REDACTED]	0.30	\$195.00	\$58.50
Service	07/09/2022	RR	Prepare for mediation including review of plaintiff's expert reports x4, K. hov reports x4. (two council approved)	5.80	\$195.00	\$1,131.00
Service	07/11/2022	RR	Attend mediation(two attorney attendance pre-approved)	7.90	\$195.00	\$1,540.50
Service	07/11/2022	MM	Draft mediation update correspondence to carrier, Mary Barrett, re status of mediation, history of offers and demands, and next steps.	0.30	\$180.00	\$54.00
Service	07/12/2022	RR	Telephone conference with L. Flieshman re: continued settlement disclosures (x2).	0.60	\$195.00	\$117.00
Service	07/12/2022	RR	Draft portion of post mediation report to include updated conference with mediator and proposal,	0.40	\$195.00	\$78.00
Service	07/12/2022	MM	Review various expert cost of repair and other docus in prep for drafting post-mediation status report.	0.70	\$180.00	\$126.00
Service	07/12/2022	MM	Draft post mediation status report re status of mediation, history of settlement negotiations and strategy for next steps. (5 pages)	2.30	\$180.00	\$414.00
Service	07/13/2022	MM	Continue drafting updated status report re status of July 11 mediation, settlement negotiations and history, and evaluation of steps going forward.	0.40	\$180.00	\$72.00
Service	07/13/2022	SGH	Phone call with Mediator Fleischman regarding continued settlement negotiations.	0.60	\$195.00	\$117.00
Service	07/14/2022	MM	Draft updated status report to client, Chris Thorton, and corporate counsel, re status of case, outcoming and procedure of second mediation, and continued settlement negotiations. (5 pages)	1.40	\$180.00	\$252.00
Service	07/14/2022	MM	Review and analyze docs for updated status report to client and corporate counsel. (89 pages)	0.40	\$180.00	\$72.00

Service	07/15/2022	SGH	Revise and supplement post mediation carrier and client report including update on continued settlement discussions with mediator, settlement strategy, liability analysis, and additional statutory defenses and recommendations (3+Million Demand)	0.80	\$195.00	\$156.00
Service	07/15/2022	SGH	Phone call from Plaintiff's counsel regarding extensive ongoing discovery, expert discovery and other issues for further handling of defense.	0.30	\$195.00	\$58.50
Service	07/19/2022	MM	Draft correspondence to all parties re experts and job file for matter and disclosure thereof for expert depositions.	0.10	\$180.00	\$18.00
Service	07/20/2022	SGH	Phone call to Lou to continue creative settlement proposal discussed at mediation.	0.30	\$195.00	\$58.50
Service	07/21/2022	MM	Draft correspondence to carrier, Mary Barrett, re status of case, and settlement authority	0.10	\$180.00	\$18.00
Service	07/21/2022	MM	Draft correspondence to expert, Harrington Construction, re status of case, expert depositions and preparation, [REDACTED].	0.10	\$180.00	\$18.00
Service	07/21/2022	MM	Review and analyze correspondence from Mary Barrett, re settlement authority for matter.	0.10	\$180.00	\$18.00
Service	07/21/2022	SGH	Phone call with Mary regarding defense strategy.	0.20	\$195.00	\$39.00
Service	07/25/2022	MM	Draft correspondence to Khov's counsel Leslie Harrach, and all counsel, re the topics of examination for the 30(b)(6) depositions to identify scope of deposition to identify proper witness.	0.10	\$180.00	\$18.00
Service	07/25/2022	MM	Draft correspondence to desert vista attorney paul frame, re requesting 30(b)(6) [REDACTED]	0.10	\$180.00	\$18.00
Service	07/25/2022	MM	(2) Review and analyze correspondence from desert vista counsel, Paul Frame, re status of case and settlement negotiations. (2 correspondences).	0.20	\$180.00	\$36.00
Service	07/25/2022	MM	Draft correspondence to desert vista counsel, Paul Frame, re status of case and settlement negotiations.	0.10	\$180.00	\$18.00
Service	07/25/2022	MM	Review and analyze correspondence from Khov's counsel, Leslie Harrach, re status of	0.10	\$180.00	\$18.00

			case and discovery re parties' 30(b)(6) representatives.			
Service	07/25/2022	MM	Telephone conference to client rep, Chris Thorton, re status of case, settlement negotiations, and depositions.	0.20	\$180.00	\$36.00
Service	07/25/2022	MM	Draft correspondence to client, Chris T., re status of case, settlement negotiations, and discussion of depositions and discovery	0.10	\$180.00	\$18.00
Service	07/25/2022	MM	Review and analyze correspondence from Desert Vista counsel, Paul Frame, re [REDACTED]	0.10	\$180.00	\$18.00
Service	07/25/2022	SGH	Appear for phone conference with KHOV's counsel regarding ongoing settlement negotiations and discovery, (X2)	0.80	\$195.00	\$156.00
Service	07/25/2022	SGH	Reviewed mediaton outcome and new authority levels to prepare for call with KHVO.	0.20	\$195.00	\$39.00
Service	07/25/2022	SGH	Phone call from KHOV counsel Leslie requesting information on PMK testimony for expert discovery.	0.20	\$195.00	\$39.00
Service	07/28/2022	RR	analyze possible extrapolation defense motion	0.50	\$195.00	\$97.50
Service	07/28/2022	MM	Call with expert harrington re case and disclosure job fiel	0.20	\$180.00	\$36.00
Service	07/29/2022	MM	Review and analyze supplemental job file from expert, harrington construction, to evaluate for sufficiency and privileged documents prior to disclosure to all counsel. (65 pages)	0.40	\$180.00	\$72.00
Service	07/29/2022	MM	Review and analyze docs for sup disclosure, including Khov's disclosure, pleadings, and expert reports, to ensure disclosure includes all necessary defenses and evidence.	0.60	\$180.00	\$108.00
Service	07/29/2022	MM	Draft third supplemental disclosure to add pertinent affirmative defenses including extrapolation and economic waste defenses. (31 pages)	1.20	\$180.00	\$216.00
Service	07/29/2022	MM	Review and analyze comprehensive topics of 30(b)(6) examination for deposition of representative of Desert Vista, in order to evaluate topics for appropriate objections.	0.20	\$180.00	\$36.00
Service	07/29/2022	MM	Review and analyze correspondence from K.hov's attorney Leslie Harrach re	0.10	\$180.00	\$18.00

			depositions, topics of examination, expert discovery.			
Service	08/01/2022	SGH	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	\$39.00
Service	08/02/2022	MM	Draft correspondence to corporate counsel, paul frame, re [REDACTED].	0.10	\$180.00	\$18.00
Service	08/02/2022	MT	Review and analyzed court order under advisement ruling on motion to preclude khov new expert reports to determine impact on case strategy and defenses. Motion GRANTED!	0.30	\$180.00	\$54.00
Service	08/02/2022	SGH	Reviewed and analyzed Plaintiffs counsel correspondence regarding expert discovery and production of expert documents.	0.10	\$195.00	\$19.50
Service	08/02/2022	SGH	Drafted Plaintiff response to inquiry on expert discovery and production of expert job files.	0.10	\$195.00	\$19.50
Service	08/02/2022	SGH	Phone call to corporate counsel regarding Order granting client's Motion to Preclude KHOV's untimely and prejudicial expert opinions and impact on client.	0.20	\$195.00	\$39.00
Service	08/02/2022	SGH	Supplement and revise 3rd Supplemental Disclosure Statement to include information required by order for expert discovery. (20+pages)	0.20	\$195.00	\$39.00
Service	08/02/2022	SGH	Client/corporate counsel phone call regarding impact of ruling on Motion to Preclude [REDACTED].	0.30	\$195.00	\$58.50
Service	08/03/2022	MM	Review and analyze correspondence from Plaintiff's counsel, Grace McGregor, re status of case, expert testimony and depositions.	0.10	\$180.00	\$18.00
Service	08/03/2022	SGH	Drafted corporate counsel and client correspondence with ruling from court granting Motion to Preclude and requesting [REDACTED].	0.20	\$195.00	\$39.00
Service	08/03/2022	SGH	Drafted adjuster correspondence regarding rulling on motion to preclude, [REDACTED].	0.20	\$195.00	\$39.00

Service	08/04/2022	SGH	Phone call from client Desert Vista regarding [REDACTED]	0.30	\$195.00	\$58.50
Service	08/04/2022	SGH	Drafted client response regarding [REDACTED]	0.10	\$195.00	\$19.50
Service	08/08/2022	MM	(3) Review and analyze correspondence from Khov's attorney, Leslie Harrach, re status of case, expert discovery, and depositions	0.20	\$180.00	\$36.00
Service	08/08/2022	MM	Review and analyze correspondence from Desert Vista corporate counsel, Paul Frame, re [REDACTED]	0.20	\$180.00	\$36.00
Service	08/08/2022	MM	Review and analyze document from corporate counsel Paul Frame, re [REDACTED]	0.10	\$180.00	\$18.00
Service	08/08/2022	SGH	Phone call from Homeowners' counsel regarding expert discovery and identification of 30B6 witnesses.	0.20	\$195.00	\$39.00
Service	08/08/2022	SGH	Drafted client and corporate counsel regarding [REDACTED]	0.10	\$195.00	\$19.50
Service	08/08/2022	SGH	Phone call with corporate counsel Paul Frame regarding [REDACTED]	0.20	\$195.00	\$39.00
Service	08/08/2022	SGH	Phone call to Expert regarding requested deposition testimony and status of discovery.	0.20	\$195.00	\$39.00
Service	08/09/2022	MM	Review and analyze Plaintiff's 15th supplemental disclosure statement to evaluate positions on case, theories of claims, and newly disclosed evidence (31 pages)	0.20	\$180.00	\$36.00
Service	08/09/2022	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 desert vista. (230 pages)	0.90	\$180.00	\$162.00
Service	08/09/2022	MM	Draft correspondence to Khov's counsel, Leslie Harrach, re status of case and time frames, depositions, and deposition of desert vista's expert.	0.10	\$180.00	\$18.00

Service	08/09/2022	MM	Review and analyze correspondence from Khov's counsel Leslie Harrach, re status of case and time frames, depositions, and deposition of desert vista's expert.	0.10	\$180.00	\$18.00
Service	08/09/2022	SGH	Phone call with Paul Frame regarding [REDACTED].	1.10	\$195.00	\$214.50
Service	08/09/2022	SGH	Prepare for deposition of Robert Van Der Waal, the Person Most Knowledgeable representative from HOA Association with authority from adjuster.	1.20	\$195.00	\$234.00
Service	08/10/2022	MM	Telephone conference with expert, Harrington Construction, re status of case, status of settlement negotiations, [REDACTED].	0.30	\$180.00	\$54.00
Service	08/10/2022	MM	Review and analyze 30(b)(6) deposition exhibit with areas of examination outlined by clients with respective employees who have knowledge of each topic to evaluate in preparation for depositions.	0.20	\$180.00	\$36.00
Service	08/10/2022	MM	Draft correspondence to clients and corporate counsel, Paul Frame, re [REDACTED].	0.10	\$180.00	\$18.00
Service	08/10/2022	SGH	Phone call with Mike Ludwig regarding general case status, collective defense strategy and anticipated deposition testimony.	0.20	\$195.00	\$39.00
Service	08/10/2022	SGH	Reviewed M.Ludwig correspondence regarding HOA representative and anticipated deposition testimony.	0.10	\$195.00	\$19.50
Service	08/10/2022	SGH	Appear for deposition of Homeowners' Association Representative of Robert Van Der Waal.	1.60	\$195.00	\$312.00
Service	08/11/2022	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.	0.40	\$180.00	\$72.00
Service	08/11/2022	MM	Review and analyze documents, correspondences, disclosures, and pleadings in preparation to draft Desert Vista's 4th supp disclosure statement. (119 pages)	0.50	\$180.00	\$90.00

Service	08/11/2022	MM	Draft Rule 26.1 fourth supplemental disclosure statement for Desert Vista to disclose additional defense documents provided by client, and to buttress affirmative defenses, including defenses on causation and damages in order to preserve defenses for trial. (32 pages)	0.80	\$180.00	\$144.00
Service	08/11/2022	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 Desert Vista. (31 pages).	0.20	\$180.00	\$36.00
Service	08/11/2022	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	\$72.00
Service	08/11/2022	MM	(2) draft correspondences to expert witness, harrington construction, re additional disclosure statements of plaintiff, and new documents including expert memorandums, to ensure Harrington's job file is complete for deposition and trial.	0.20	\$180.00	\$36.00
Service	08/11/2022	SGH	Phone call with expert regarding new expert documents disclosed today and impact on claims/defenses.	0.20	\$195.00	\$39.00
Service	08/11/2022	SGH	Revise and further supplement client's supplemental and mandatory 26.1 disclosure statement based on new information provided by client and corporate counsel. 26 pages	0.30	\$195.00	\$58.50
Service	08/12/2022	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 desert vista.	0.20	\$180.00	\$36.00
Service	08/12/2022	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 Desert Vista. (392 pages)	0.70	\$180.00	\$126.00
Service	08/12/2022	SGH	Appear for all counsel conference regarding	0.30	\$195.00	\$58.50

			discovery and case proceedings.			
Service	08/17/2022	MM	Review and analyze correspondence from Plaintiff's counsel, Penny Manship, re status of case, Gc's 30(b)(6) representative, and strategy for deposition.	0.10	\$180.00	\$18.00
Service	08/17/2022	MM	Review and analyze multiple correspondences from Desert Vista's corporate counsel, Paul Frame, re [REDACTED]	0.30	\$180.00	\$54.00
Service	08/17/2022	MM	Review and analyze notice of 30(b)(6) deposition of Khov's representative, including scope of examination and topics, in order to adequately prepare for deposition. (9 pages)	0.20	\$180.00	\$36.00
Service	08/17/2022	MM	Review and analyze documents in preparation for for call with corporate counsel Paul Frame to discuss [REDACTED]	0.40	\$180.00	\$72.00
Service	08/17/2022	MM	Telephone conference with Desert Vista's corporate counsel, Paul Frame, re status of case, [REDACTED]	0.60	\$180.00	\$108.00
Service	08/17/2022	MM	Telephone conference to Khov's counsel, Leslie Harrach, re status of case, 30(b)(6) representatives, and expert discovery.	0.20	\$180.00	\$36.00
Service	08/18/2022	MM	Telephone conference w/ Khov's counsel, Leslie Harrach, re status of case, 30(b)(6) depositions, and settlement negotiations.	0.30	\$180.00	\$54.00
Service	08/19/2022	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	\$126.00
Service	08/19/2022	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	\$108.00
Service	08/19/2022	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.	0.30	\$180.00	\$54.00
Service	08/19/2022	MM	Review and analyze Plaintiff's expert	0.60	\$180.00	\$108.00

			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).			
Service	08/19/2022	MM	Review and analyze Desert Vista's expert report by HCCI, in order to evaluate [REDACTED]	0.60	\$180.00	\$108.00
Service	08/21/2022	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 Desert Vista.(652 pages).	2.30	\$180.00	\$414.00
Service	08/22/2022	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	2.80	\$195.00	\$546.00
Service	08/22/2022	MM	Draft correspondence to all parties, re the scope of testimony of Desert Vista's 30(b)(6) witnesses to ensure scope of examination is limited to designated topics.	0.10	\$180.00	\$18.00
Service	08/22/2022	MM	(2) Telephone conference w/ Desert Vista's expert, West Harrington, re status of case, expert depositions, report, and strategy in order to prepare for his expert deposition.	0.50	\$180.00	\$90.00
Service	08/22/2022	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 Desert Vista.(32 pages).	0.30	\$180.00	\$54.00
Service	08/22/2022	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)	0.30	\$180.00	\$54.00
Service	08/22/2022	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	3.10	\$180.00	\$558.00

			documents and photographs to use as exhibits to bolster defense of Desert Vista.(>5,000 pages)			
Service	08/22/2022	MM	Draft correspondence to expert, West Harrington, re notice of deposition, and additional documents disclosed by Plaintiff.	0.10	\$180.00	\$18.00
Service	08/22/2022	MM	Draft correspondence to adjuster, Mary Barrett, re [REDACTED].	0.10	\$180.00	\$18.00
Service	08/23/2022	RR	Attend deposition of plaintiffs standard of care expert Ed Fronapfel	2.00	\$195.00	\$390.00
Service	08/23/2022	RR	prepare for deposition of plaintiff expert S. Gustotson (cost of repair)	1.50	\$195.00	\$292.50
Service	08/23/2022	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. (817 pages).	1.90	\$180.00	\$342.00
Service	08/24/2022	RR	attend/take deposition of S. Gustatson, plaintiff's cost of repair expert	1.70	\$195.00	\$331.50
Service	08/24/2022	RR	telephone conference with L. Horowitz, counsel for Khov re: case procedural status, motions and settlement	0.70	\$195.00	\$136.50
Service	08/24/2022	RR	expert telephone conference with L. Horowitz re: motions and settlement strategy	0.40	\$195.00	\$78.00
Service	08/24/2022	MM	Review and analyze notice of 30(b)(6) deposition of client Chris Thornton, including exhibit with scope of examination topics, [REDACTED].	0.20	\$180.00	\$36.00
Service	08/24/2022	MM	Review and analyze notice of 30(b)(6) deposition of client Todd Jones, including exhibit with scope of examination topics, in [REDACTED].	0.10	\$180.00	\$18.00
Service	08/24/2022	MM	Review and analyze various disclosures for Khov's specifications that state the specifications override the design plans.	0.50	\$180.00	\$90.00
Service	08/24/2022	MM	Review and analyze expert report by Khov's expert, Bert Howe, in order to evaluate report for allocation of fault, or	0.30	\$180.00	\$54.00

			specific identification of each subcontractor's scope of work, to evaluate [REDACTED]			
Service	08/24/2022	MM	Review and analyze expert report for desert vista by West Harrington in order to evaluate report for allocation of fault, or specific identification of each subcontractor's scope of work, to evaluate [REDACTED]	0.40	\$180.00	\$72.00
Service	08/25/2022	RR	Attend client deposition prep	1.60	\$195.00	\$312.00
Service	08/25/2022	MM	Review and analyze Reservation of rights issued to desert vista prior to disclosure thereof to all parties.	0.30	\$180.00	\$54.00
Service	08/25/2022	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).	2.70	\$180.00	\$486.00
Service	08/25/2022	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 Desert Vista's defenses are raised and preserved. (237 pages).	0.80	\$180.00	\$144.00
Service	08/25/2022	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).	2.10	\$180.00	\$378.00
Service	08/25/2022	MM	Review and analyze correspondence from client, Todd Jones, re [REDACTED].	0.10	\$180.00	\$18.00
Service	08/26/2022	RR	Prepare for deposition of T. Ingo including review of reports (expert), job file materials, and court ruling	1.70	\$195.00	\$331.50
Service	08/26/2022	MM	Review and analyze stipulation and	0.20	\$180.00	\$36.00

			proposed order re disclosure cut off from plaintiff's counsel Penny Manship, in order to evaluate sufficiency for defense of insured.			
Service	08/26/2022	MM	Draft correspondence to all parties re sufficiency of proposed stipulation and order re disclosure timeframes and cute off.	0.10	\$180.00	\$18.00
Service	08/26/2022	MM	Review and analyze photographs from Plaintiff's expert destructive testing to evaluate photographs of foam that include sufficient cuts and samples necessary to prove Plaintiff's claim re the foam having insufficient grooves at insufficient spaces, in order to identify potential defense to claim per client request. (1-2,564)	2.30	\$180.00	\$414.00
Service	08/26/2022	MM	Appear for and attend deposition of Khov's geotechnical expert, Curt Peterson, in order to defense Desert Vista and make necessary objections and/or examination of witness.	1.70	\$180.00	\$306.00
Service	08/27/2022	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)	2.30	\$180.00	\$414.00
Service	08/28/2022	MM	Review and analyze videos of DT and stucco from Khov's expert, Bert Howe's, job file in order to evaluate [REDACTED]	0.30	\$180.00	\$54.00
Service	08/28/2022	MM	Continue reviewing and analyze photographs and documents from Plaintiff's destructive testing of the stucco in order to evaluate [REDACTED] (2565 through 4551)	4.20	\$180.00	\$756.00
Service	08/28/2022	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)	0.90	\$180.00	\$162.00
Service	08/29/2022	RR	attend deposition of Khov expert Terry Ingo	2.30	\$195.00	\$448.50

Service	08/29/2022	RR	telephone call with L. Horowitz re: settlement continued auth for OJ.	0.30	\$195.00	\$58.50
Service	08/29/2022	RR	Review and analyze and draft correspondents to other sub counsel re: joint defense strategy re: lack of causation testimony (x6)	0.30	\$195.00	\$58.50
Service	08/29/2022	MM	Continue drafting Desert Vista'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. (32 pages)	0.80	\$180.00	\$144.00
Service	08/29/2022	MM	Draft correspondence to clients and corporate counsel, re 4th supplemental disclosure statement, [REDACTED]	0.10	\$180.00	\$18.00
Service	08/29/2022	MM	Review and analyze correspondence from client representative, Todd Jones, re [REDACTED]	0.20	\$180.00	\$36.00
Service	08/29/2022	MM	Draft correspondences to client representative, Todd Jones, re [REDACTED]	0.20	\$180.00	\$36.00
Service	08/29/2022	MM	Review and analyze correspondence from clients and corporate counsel Paul Frame, re requesting list of lot numbers and addresses relevant to grooved foam allegations.	0.10	\$180.00	\$18.00
Service	08/29/2022	MM	Review and analyze correspondence from client's corporate counsel, Paul Frame re [REDACTED]	0.10	\$180.00	\$18.00
Service	08/30/2022	RR	prepare for deposition of framer 30(b)(6) and expert including review of framer job file and expert reports (le Blame and Evan Marshall)	1.30	\$195.00	\$253.50
Service	08/30/2022	RR	attend deposition of framer 30(b)(6)	0.90	\$195.00	\$175.50
Service	08/30/2022	RR	Attend/ take deposition of Evan Marshall expert for framer	1.00	\$195.00	\$195.00

Service	08/30/2022	RR	conference with client and expert re: [REDACTED]	0.40	\$195.00	\$78.00
Service	08/30/2022	MM	Draft correspondence to clients and paul frame re [REDACTED]	0.10	\$180.00	\$18.00
Service	08/30/2022	MM	Draft correspondence to clients and paul frame re [REDACTED]	0.10	\$180.00	\$18.00
Service	08/30/2022	MM	Draft correspondence to clients and paul frame re [REDACTED]	0.10	\$180.00	\$18.00
Service	08/30/2022	MM	Review and analyze documents re invoices, allegations, locations, and photographs of allegedly defective foam grooves, in order to refute allegation at depositions, per request of client and client's corporate counsel. (628 pages)	2.20	\$180.00	\$396.00
Service	08/30/2022	MM	Review and analyze documents, including voluminous expert reports, our expert report, plans and specifications, pertinent photographs, ESR reports provided by clients, in preparation for deposition preparation meeting with Desert Vista's expert West Harrington. (310 pages)	1.20	\$180.00	\$216.00
Service	08/30/2022	MM	Appear for deposition preparation meeting w/ clients Todd Jones and Chris Thornton, corporate counsel, Paul FRame, and expert witness, West Harrington, to discuss the alleged defects, scope of work, industry standards and Desert Vista's practices, in preparation for depositions of clients and experts.	2.60	\$180.00	\$468.00
Service	08/30/2022	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.	0.40	\$180.00	\$72.00
Service	08/30/2022	MM	Review and analyze UES evaluation report no. 427 provided by client for installation of stucco coating.	0.30	\$180.00	\$54.00
Service	08/30/2022	MM	Comprehensively review and analyze documents for the deposition of Khov's 30b6, Joe Chelsey, including correspondences, contract, permits, photographs, Khov's' specifications,	2.40	\$180.00	\$432.00

			pleadings, and other documents in order to defend desert Vista. (3130 pages)			
Service	08/30/2022	MM	Review and analyze correspondence from client, Todd Jones, re [REDACTED]	0.20	\$180.00	\$36.00
Service	08/30/2022	MM	Review and analyze correspondence from client, todd Jones, re [REDACTED]	0.10	\$180.00	\$18.00
Service	08/30/2022	MM	Draft correspondence to clients re [REDACTED]	0.10	\$180.00	\$18.00
Service	08/30/2022	MM	Review and analyze correspondence from corporate counsel for insured, Paul Frame, re [REDACTED]	0.20	\$180.00	\$36.00
Service	08/30/2022	MM	Review and analyze stipulated order to amend discovery and disclosure landscape in matter filed by Plaintiff's counsel.	0.10	\$180.00	\$18.00
Service	08/30/2022	MM	Review and analyze specific design plans for edge drip on awnings provided by client to evaluate [REDACTED]	0.10	\$180.00	\$18.00
Service	08/30/2022	MM	Review and analyze UES Evaluation report re Amerimix stucco coating provided by client, which lists all appropriate uses in order to further bolster defenses against improper stucco allegations.	0.20	\$180.00	\$36.00
Service	08/30/2022	MM	Review and analyze correspondence from client, Todd Jones, re [REDACTED]	0.20	\$180.00	\$36.00
Service	08/31/2022	RR	prepare for deposition of 30(b)(6) of KHov including review of Khov disclosures and portions of job file (150 pages)	1.40	\$195.00	\$273.00
Service	08/31/2022	RR	Attend deposition of Khov 30(b)(6)	1.50	\$195.00	\$292.50
Service	08/31/2022	MM	Telephone conference w/ expert, West Harrington, re deposition prep, discussion of cost of repair, and testimony of other experts.	0.40	\$180.00	\$72.00
Service	08/31/2022	MM	Review and analyze manufacturer	0.20	\$180.00	\$36.00

			guidelines for EPS foam provided by clients to evaluate [REDACTED]			
Service	08/31/2022	MM	Research rule 68 apportionment in preparation to draft offer of judgment to the remaining two Khov entities to ensure OJ is sufficient and valid.	0.30	\$180.00	\$54.00
Service	08/31/2022	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)	0.90	\$180.00	\$162.00
Service	08/31/2022	MM	Comprehensively review and analyze subcontract between Desert Vista 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	\$54.00
Service	08/31/2022	MM	Review and analyze documents in prep for drafting Desert Vista's 5th supplemental disclosure statement	0.40	\$180.00	\$72.00
Service	08/31/2022	MM	Draft 5th supp disclosure statement to disclose additional scope of testimony of clients Todd Jones and Chris Thornton, and disclose useful documents prior to depositions. (33 pages)	0.50	\$180.00	\$90.00
Service	08/31/2022	MM	Review and analyze correspondence from client, Todd Jones, re [REDACTED]	0.10	\$180.00	\$18.00
Service	08/31/2022	MM	Review and analyze correspondence from client, Todd Jones, re [REDACTED]	0.10	\$180.00	\$18.00
Service	08/31/2022	MM	Review and analyze ESR-2407 report provided by client re [REDACTED]	0.20	\$180.00	\$36.00
Service	08/31/2022	MM	Draft correspondence to client, Todd Jones, re [REDACTED]	0.20	\$180.00	\$36.00

Service	08/31/2022	MM	Draft correspondence to clients re 4th supplemental disclosure statement	0.10	\$180.00	\$18.00
Service	08/31/2022	MM	Draft correspondence to all clients and corporate counsel re depositions and strategy for depositions on behalf of desert vista.	0.10	\$180.00	\$18.00
Service	09/01/2022	MM	Draft correspondence to all parties re executed verification for Desert Vista's 4th supplemental disclosure statement.	0.10	\$180.00	\$18.00
Service	09/01/2022	MM	Telephone conference w/ client chris thornton re	0.30	\$180.00	\$54.00
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	0.30	\$180.00	\$54.00
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	MM	Review and analyze correspondence from Plaintiff's counsel, Grace Osberg, re final discovery cut off for matter.	0.10	\$180.00	\$18.00
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	09/01/2022	RR	Defend deposition of client Todd Jones	2.60	\$195.00	\$507.00
Service	09/01/2022	RR	Defend deposition of client C.Thornton	0.50	\$195.00	\$97.50
Service	09/01/2022	RR	Attend pre-deposition meeting with client and personal counsel	0.70	\$195.00	\$136.50
Service	09/01/2022	RR	Conference call with C.Thornton client RE: deposition preparation	0.20	\$195.00	\$39.00
Service	09/02/2022	MM	Telephone conference w/ expert West Harrington, re scope of investigation, cost	0.50	\$180.00	\$90.00

			of repair, [REDACTED]			
Service	09/02/2022	MM	Appear for deposition of Renco's expert witness, Chad Polvka, in order to further Desert Vista's defenses and interests.	1.90	\$180.00	\$342.00
Service	09/02/2022	MM	Appear for deposition of renco 30(b)(6) witness, Jeff Nickerson, in order to attend on behalf of Desert Vista to ensure their interests are being defended.	1.10	\$180.00	\$198.00
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 vista. (273 pages).	1.10	\$180.00	\$198.00
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	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	RR	Pre-deposition meeting with client	0.70	\$195.00	\$136.50
Service	09/05/2022	RR	Prepare for deposition of W.Harrington (desert vista expert) including review report, cost estimate on all parties	2.40	\$195.00	\$468.00
Service	09/05/2022	RR	Telephone call with W.Harrington RE: Deposition preparation	0.80	\$195.00	\$156.00
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 file for different versions of master subcontract agreement as requested by client, todd jones, to evaluate potential different terms.	0.30	\$180.00	\$54.00
Service	09/07/2022	MM	Review and analyze 4th Supplemental Disclosure Statement from Liberty Constructors to evaluate new affirmative defenses, including lack of causation, and new evidence to evaluate impact on case and defense of insured. (16 pages).	0.20	\$180.00	\$36.00
Service	09/07/2022	MM	Review and analyze newly disclosed documents by Liberty Constructors in order to evaluate impact on case or defense of	0.30	\$180.00	\$54.00

			insured. (164 pages)			
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).	0.20	\$180.00	\$36.00
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)	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 Desert Vista	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	Review and analyze documents, expert reports, cost of repair, photographs, and correspondences in preparation for deposition of expert, Alan Shelton, to appear on behalf of Desert Vista and defend their interests. (361 pages, with Mary Barretts authority)	1.70	\$180.00	\$306.00
Service	09/14/2022	MM	Appear for deposition of liberty contractor's expert witness, Allen Shelton, in order to defend Desert Vista's interest. (pursuant to Mary Barret authority)	1.70	\$180.00	\$306.00
Service	09/14/2022	MM	Review and analyze subpoena's issued by claimants to Grand Materials & supply to evaluate validity of sub, and information sought and impact on defense of case.	0.20	\$180.00	\$36.00
Service	09/15/2022	MM	Review and analyze Plaintiff's updated/ amended written discovery verifications to evaluate impact on case and defense of insured.	0.10	\$180.00	\$18.00
Service	09/16/2022	RR	Outline MSJ RE: Khou inability to prove causation of fault RE: indemnity claim	0.80	\$195.00	\$156.00
Service	09/16/2022	RR	Review new anti-inclemnity statue to determine effect on Khou's written indemnity provision to burden of proof	0.50	\$195.00	\$97.50

Service	09/16/2022	RR	Extensive telephone conference with L.Horowitz attorney for Khov RE: MSJ RE: causation and offer to settle and global with plaintiff	0.60	\$195.00	\$117.00
Service	09/19/2022	MM	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 Mary Barrett. (71 pages)	0.30	\$180.00	\$54.00
Service	09/19/2022	MM	Draft status report update correspondence to adjuster Mary Barret, re status of case, conclusion of discovery and evaluation of [REDACTED]	0.10	\$180.00	\$18.00
Service	09/19/2022	RR	Extensive telephone call with L.Horowitz RE: MSJ RE: improper extrapolation	0.70	\$195.00	\$136.50
Service	09/20/2022	MM	Review and analyze documents in preparation for meet and confer conference with Plaintiff's counsel, Penny Manship, over dispute of dispositive motion timeframe.	0.50	\$180.00	\$90.00
Service	09/20/2022	MM	Telephone conferences w/ plaintiff's counsel Penny Manship, re meet and confer over dispositive motion timeframe and impact on case. (3 calls)	0.50	\$180.00	\$90.00
Service	09/20/2022	MM	Continue drafting proposed stipulation and court order re timeframes for disclosure and dispositive motions. (2 documents, 8 pages)	0.30	\$180.00	\$54.00
Service	09/20/2022	MM	Review and analyze correspondence from defense attorney Mike Ludwig re approval of proposed order and authority to sign and file.	0.10	\$180.00	\$18.00
Service	09/20/2022	MM	Review and analyze correspondence from KHov's counsel, Lou Horowitz, re approval to file proposed order with court.	0.10	\$180.00	\$18.00
Service	09/20/2022	MM	Review and analyze correspondence from Plaintiff's counsel, Penny Manship, re timelines on dispositive motions and meet and confer on issue.	0.10	\$180.00	\$18.00
Service	09/20/2022	RR	Telephone call with Harrington expert RE: assistance in preparation for extrapolation motion	0.60	\$195.00	\$117.00
Service	09/22/2022	MM	Conduct legal research re causation standard/burden, expert testimony, and indemnification, in preparation to draft	0.80	\$180.00	\$144.00

			Motion for Summary Judgment (with Mary Barrett authority, 9/20/22)			
Service	09/22/2022	RR	Review and analyze expert analysis and drawing to demonstrate lack of evidence RE: foam claim	0.60	\$195.00	\$117.00
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 Mary Barrett authority)	0.80	\$180.00	\$144.00
Service	09/24/2022	MM	Review and analyze deposition transcript of Desert Vista's expert, west harrington, to evaluate testimony for affirm no causation opinion has been issued on cause of defects, and for testimony that may be used to create material issue of fact, in preparation for drafting MSJ. (186 pages, w/ Mary Barrett's authority)	1.40	\$180.00	\$252.00
Service	09/24/2022	MM	Review and analyze deposition transcript of Desert Vista president Todd Jones, 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 (116 pages, with MArY Barrett's authority 9/20/22)	0.80	\$180.00	\$144.00
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 Mary Barrett's 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 Mary Barrett's authority, 9.20,22).	1.10	\$180.00	\$198.00
Service	09/25/2022	MM	Begin drafting Motion for Summary judgment against general contractor Khovnanian on grounds of lack of causation. (6 pages, with Mary Baret authority)	2.90	\$180.00	\$522.00
Service	09/26/2022	RR	Extensive telephone call with L. Horowitz, Khov counsel RE: MSJ's forthcoming and	0.60	\$195.00	\$117.00

extrapolation motion assistance						
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	Continue drafting Motion for Summary Judgment re Causation, including argument section against indemnity, duty to defend, negligence and contribution. (11 pages, per mary barret's authority)	2.80	\$180.00	\$504.00
Service	09/27/2022	MM	3499-B: Review and analyze documents, including job file, documents disclosed by Plaintiff and Khov, necessary to support factual allegations in desert Vista's 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. (920 pages, reviewed with Mary Barret's authority, 9/20/22).	2.40	\$180.00	\$432.00
Service	09/27/2022	MM	Conduct legal research on [REDACTED]	0.90	\$180.00	\$162.00
Service	09/28/2022	MM	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 Mary Barret's authority 9/20/22)	3.90	\$180.00	\$702.00
Service	09/28/2022	MM	Draft correspondence to Mary Barrett, re status of MSJ and [REDACTED].	0.10	\$180.00	\$18.00
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	Review and analyze documents in preparation to draft SSOF for MSJ. (221 pages, with Mary Barret's authority 9/20/22).	0.60	\$180.00	\$108.00
Service	09/29/2022	MM	Draft mandatory comprehensive separate status of facts required for Motion for summary judgment, alleging facts and	3.60	\$180.00	\$648.00

			citing to supporting documents that support material facts being undisputed and summary judgment being warranted. (7 pages, with Mary Barrett's authority 9/20/22)			
Service	09/29/2022	MM	Continue drafting Declaration by Expert West Harrington re investigation of EPS foam board allegations and evidence in support of a motion on Plaintiff's inadequate extrapolation methods. (4 pages)	0.50	\$180.00	\$90.00
Service	09/29/2022	MM	Review and analyze correspondence from Mary Barrett, re [REDACTED]	0.10	\$180.00	\$18.00
Service	09/29/2022	MM	Draft correspondence to Mary Barrett, re [REDACTED]	0.10	\$180.00	\$18.00
Service	09/29/2022	RR	Draft portion of MSJ RE: econ loss doctrine, disgusted indemnity claims, and duty to defend (4 pages)	1.30	\$195.00	\$253.50
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	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 Mary Barret's authority 9/20/22).	1.20	\$180.00	\$216.00
Service	09/30/2022	MM	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 Mary Barret's authority 9/20/22).	0.50	\$180.00	\$90.00
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 Desert Vista, 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 desert vista.	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 Desert Vista, and whether a joinder is warranted.	0.40	\$180.00	\$72.00
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 and weight of undisputed facts to evaluate impact on case, defense of Desert Vista, and whether a joinder is necessary.	0.20	\$180.00	\$36.00
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)	0.60	\$180.00	\$108.00
Service	09/30/2022	MM	Review and analyze correspondence from adjuster Mary Barrett re [REDACTED]	0.10	\$180.00	\$18.00
Service	09/30/2022	MM	Draft correspondence to defense counsel Mike Ludwig and Jason Boblick re draft motions for summary judgment for strategy and joinders.	0.10	\$180.00	\$18.00
Service	09/30/2022	MM	Review and analyze correspondence from Jason Boblick re draft motions for summary judgment for strategy and joinders.	0.10	\$180.00	\$18.00
Service	09/30/2022	MM	Review and analyze correspondence from Mike Ludwig re draft motions for summary judgment for strategy and joinders.	0.10	\$180.00	\$18.00
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
<b>Services Subtotal</b>						<b>\$34,065.00</b>

**Expenses**

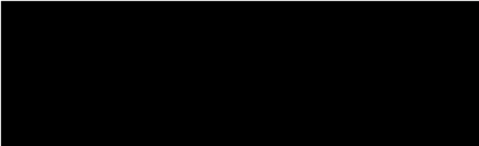
Type	Date	Notes	Quantity	Rate	Total
Expense	08/25/2022	Expense for professional services provided by Nautilus Building Consultants, Inc. Invoice no. 13163 (1/2 expense billed)	1.00	\$56.25	\$56.25
Expense	09/02/2022	Expense for professional services provided by Esquire Deposition Solutions, Invoice no.: 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	\$403.88	\$403.88
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	\$264.83	\$264.83
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	\$185.63	\$185.63

**Expenses Subtotal      \$3,029.54**

Time Keeper	Quantity	Rate	Total
Shannon Guerrero Huff	13.7	\$195.00	\$2,671.50
Marcus McGillivray	107.7	\$180.00	\$19,386.00
Rina Rai	61.3	\$195.00	\$11,953.50
Mohamad Tokko	0.3	\$180.00	\$54.00

**Subtotal      \$37,094.54**

**Total      \$37,094.54**



## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
[Redacted]				

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
53093	11/24/2022	\$37,094.54	[Redacted]	[Redacted]
			<b>Outstanding Balance</b>	[Redacted]
			<b>Total Amount Outstanding</b>	[Redacted]

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

Please pay within 30 days.



# INVOICE

Invoice # 53417  
Date: 01/24/2023  
Due On: 02/23/2023

## Rai Duer, P.C.

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

National Claim Services-Oct/Jan/April/July

### 3499-B

### Desert Vista adv. K. Hovnanian

#### Services

Type	Date	Attorney	Notes	Quantity	Rate	Total
Service	10/03/2022	MM	Telephone conference with AI adjuster, Chris K., discussing [REDACTED]	0.30	\$180.00	\$54.00
Service	10/03/2022	MM	Review and analyze Additional Insured ROR provided by NCS in order to demonstrate defense payments being made on behalf of desert vista to KHov to support motion for summary judgment. (12 pages)	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.	0.50	\$180.00	\$90.00
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 draft substantive joinder re EPS foam boards.	0.40	\$180.00	\$72.00
Service	10/03/2022	MM	Comprehensively review and analyze exhibits and documents attached to KHov's MSJ re extrapolation, including pertinent	0.70	\$180.00	\$126.00

			expert depositions and reports, declarations, and other evidence in preparation to draft substantive joinder for Desert Vista. (125 pages)			
Service	10/03/2022	MM	Review and analyze correspondence from AI adjuster, Chris Kazarian, re [REDACTED]	0.10	\$180.00	\$18.00
Service	10/04/2022	MM	Review and analyze correspondence from carrier Marry Barret, [REDACTED]	0.10	\$180.00	\$18.00
Service	10/04/2022	MM	review and analyze correspondence from Plaintiff's counsel, Penny Manship, re meet and confer over dispute of motion for summary judgment	0.10	\$180.00	\$18.00
Service	10/05/2022	MM	Conduct legal research on standards for establishing evidence using statistical sampling and extrapolation in preparation to draft substantive joinder to KHov's motion re same. (With Mary Baret's authority, 9/20/22).	1.20	\$180.00	\$216.00
Service	10/06/2022	MM	Review and analyze Liberty Constructor's amended declaration for motion for summary judgment re causation.	0.20	\$180.00	\$36.00
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 Desert Vista. (87 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	0.50	\$180.00	\$90.00

			statements, and relevant correspondence in preparation of drafting status report to carrier.			
Service	11/14/2022	MT	Drafted status report to carrier to provide an update on [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	RR	draft 1 page of status update to include motion practice and settlement status with plaintiff.	0.60	\$195.00	\$117.00
Service	11/17/2022	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	11/18/2022	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.	0.60	\$180.00	\$108.00

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.	0.70	\$180.00	\$126.00
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
Service	12/06/2022	MT	Review and analyzed Defendant KHov's Reply in support of their motion for partial summary judgment regarding claims of unsupported defects by plaintiff to determine impact on our pending MSJ and impact on client implication if our MSJ is not granted.	0.70	\$180.00	\$126.00
Service	12/07/2022	MT	Review and analyzed Defendant KHov's reply in support of their motion for summary judgment regarding plaintiff's cause of action to determine impact on pending MSJ and client implication/strategy.	0.70	\$180.00	\$126.00
Service	12/09/2022	MT	Researched arizona case law and rules on joinder of motion in civil procedure in preparation of filing motion to join (joinder) of KHov's MSJs against plaintiff.	0.40	\$180.00	\$72.00
Service	12/12/2022	MT	Review and analyzed defendant KHov's motion for summary judgment against Plaintiff for each cause of action and partial summary judgment against Plaintiff for unsupported defects to determine if we should join in KHov's MSJs against Plaintiff and in preparation of joining KHov's MSJs.	0.80	\$180.00	\$144.00
Service	12/12/2022	MT	Drafted motion to join (joinder) of kHov's	0.70	\$180.00	\$126.00

			motions for summary judgment against plaintiff for each cause of action and unsupported defects to ensure client's defenses are protected and in preparation of ruling.			
Service	12/16/2022	RR	Corresp with M. Ludwig, defense counsel re: participation in defense of Khov by client. x 4	0.30	\$195.00	\$58.50
Service	12/22/2022	RR	Conference call with client re: case status and future handling.	0.40	\$195.00	\$78.00
<b>Services Subtotal</b>						<b>\$4,080.00</b>

**Expenses**

Type	Date	Notes	Quantity	Rate	Total
Expense	09/30/2022	Expense for court filing fees, FormSet #7256561	1.00	\$6.70	\$6.70
Expense	12/13/2022	Expense for court filing fees, FormSet #7483472	1.00	\$6.70	\$6.70
<b>Expenses Subtotal</b>					<b>\$13.40</b>

Time Keeper	Quantity	Rate	Total
Marcus McGillivray	4.8	\$180.00	\$864.00
Rina Rai	3.2	\$195.00	\$624.00
Mohamad Tokko	14.4	\$180.00	\$2,592.00
<b>Subtotal</b>			<b>\$4,093.40</b>
<b>Total</b>			<b>\$4,093.40</b>

**Detailed Statement of Account**

**Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
----------------	--------	------------	-------------------	-------------

53417	02/23/2023	\$4,093.40	\$0.00	\$4,093.40
-------	------------	------------	--------	------------

---

**Outstanding Balance**  
**Total Amount Outstanding**



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

Please pay within 30 days.