

1 DYER BREGMAN & FERRIS, PLLC  
2 3411 N. 5th Avenue, Suite 300  
3 Phoenix, Arizona 85013-3811  
4 (602) 254-6008  
5 Stockton D. Banfield #027789  
6 [sdb@dbfazlaw.com](mailto:sdb@dbfazlaw.com)

7 WONG & CARTER  
8 3003 N. Central Avenue, Ste. 1000  
9 Phoenix, Arizona 85012  
10 (602) 287-3360  
11 Rick Carter #012660  
12 [rcarter@wongandcarter.com](mailto:rcarter@wongandcarter.com)  
13 Matthew A. Klopp #023313  
14 [mklopp@wongandcarter.com](mailto:mklopp@wongandcarter.com)

15 Attorneys for Plaintiffs

16  
17 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
18 **IN AND FOR THE COUNTY OF NAVAJO**

19 GORDON GROSS and LILIANA  
20 GROSS, husband and wife; 854 PINE  
21 CREEK, LLC, an Arizona limited liability  
22 company; BALD EAGLE RETREAT,  
23 LLC, an Arizona limited liability company;  
24 1501 RAINBOW VIEW, LLC, an Arizona  
25 limited liability company; LAKESIDE  
26 FAMILY INVESTMENTS, LLC, an  
27 Arizona limited liability company,  
28 STEVEN A. KERNAGIS AND SANDRA  
K. KERNAGIS, trustees of THE STEVEN  
AND SANDRA KERNAGIS TRUST  
DATED MARCH 17, 2014; THOMAS P.  
ZEHRING AND JEANNETTE ROSE  
ZEHRING, trustees of THE ZEHRING  
LIVING TRUST DATED MARCH 1,  
2001; and JEANNETTE ZEHRING,

Plaintiffs,

v.

THE SHORES AT RAINBOW LAKE  
COMMUNITY ASSOCIATION, an  
Arizona domestic nonprofit corporation,

Defendant.

No.: S0900CV202200042

**DECLARATION OF COUNSEL IN  
SUPPORT OF APPLICATION FOR  
ATTORNEYS' FEES AND COSTS**

Re: September 14, 2022 Ruling on Motion  
and Cross-Motion for Summary Judgment

1 I, Stockton D. Banfield, being first duly sworn, upon oath, state:

2 1. I am the primary attorney and lead counsel for Plaintiffs (the “Homeowners”),  
3 and in that capacity, I am responsible for, among other customary duties, oversight of the  
4 Homeowners’ account, final revision and submission of all invoices, and handling of all  
5 payments from and on behalf of the clients including charges incurred. In such capacity, I  
6 have authority to make this Declaration and to make it on my own personal knowledge and  
7 respectfully submit this statement regarding attorneys’ fees and costs pursuant to *In the*  
8 *Matter of Conservatorship of Fallers*, 181 Ariz. 227, 889 P.2d 20 (1994) and *Schweiger v.*  
9 *China Doll Restaurant, Inc.*, 138 Ariz. 183, 673 P.2d 927 (1983).

10 2. I have attached a representative copy of the Legal Services Agreement (“LSA”)  
11 that was signed by the Plaintiffs in this matter. The LSA provided that I was associating  
12 with the firm of Wong & Carter and that all invoices from Wong & Carter would be sent  
13 to Dyer, Bregman & Ferris, PLLC and would be paid out of trust money provided by the  
14 clients. The LSA disclosed this information and the Plaintiffs were provided with all  
15 invoices from Wong & Carter. *See, Exhibit A*<sup>1</sup>.

16 3. In my capacity as the primary attorney, I associated with the law firm of Wong  
17 & Carter, P.C. and the attorneys Rick Carter, Matthew Klopp and Joseph Rainey and they  
18 provided a Legal Services Agreement to associate with Dyer, Bregman, & Ferris, PLLC  
19 detailing their hourly rate for each attorney. *See, Exhibit B*. In my capacity as the primary  
20 attorney, I received the monthly invoices and statements from Wong & Carter and have  
21 reviewed each of them.

22 4. Wong & Carter sent Dyer, Bregman & Ferris, PLLC monthly records maintained  
23 for services performed for the Homeowners concerning the attorneys’ fees and provided the  
24 same to Dyer, Bregman & Ferris, PLLC. I have reviewed Wong & Carter’s records  
25 maintained in the ordinary course of business concerning the attorneys’ fees and other costs  
26 incurred in this matter since the Homeowners began seeking to invalidate the short-term rental

27 \_\_\_\_\_  
28 <sup>1</sup> This is a representative copy that each plaintiff signed with Dyer, Bregman & Ferris, PLLC. For ease of use only  
one was included.

1 prohibitions in the First Amendment to the Shores Declaration. The records maintained by  
2 Wong & Carter concerning attorneys' fees and court costs are attach as **Exhibit C**.

3 5. Dyer, Bregman & Ferris, PLLC maintained monthly records for services performed  
4 for the Homeowners concerning the attorneys' fees and other costs incurred in this matter  
5 since the Homeowners began seeking to invalidate the short-term rental prohibitions in the  
6 First Amendment to the Shores Declaration. The records maintained by Dyer, Bregman &  
7 Ferris, PLLC concerning attorneys' fees and court costs are attach as **Exhibit D**.

8 6. I personally attest that the hourly fees charged to the Homeowners by Dyer,  
9 Bregman & Ferris as well as Wong & Carter were reasonable and commensurate with (if not  
10 lower than) what other similarly experienced civil commercial litigation law firms in the area  
11 might charge. The hourly rates charged to the Homeowners were between \$250.00 and  
12 \$350.00 per hour for attorney time depending upon the experience level of the attorney.

13 7. I submit that I consider our firm's billing rates as well as the billing rates of Wong  
14 & Carter to be reasonable given due consideration to the following: the attorneys' ability,  
15 training, education, experience, skill, and professional standing; the complexity and difficulty  
16 of the work performed; the time and skill required; and the ultimate result obtained.

17 8. I attest that the detailed Professional Services Statement reflecting an itemization of  
18 legal services and expenses incurred in connection with this matter since August, 2021 (the  
19 date of our firm's initial consultation with the Homeowners in connection with their desire  
20 to force the Defendant to quiet title to their respective properties by removing the invalid  
21 short-term rental prohibition contained in the First Amendment from the public record and,  
22 thereby stopping the encumbrance of their respective properties by the same Defendant) by  
23 both Dyer, Bregman & Ferris and Wong & Carter. The Statements have been redacted to  
24 protect attorney-client privilege/work product protected information and to remove entries  
25 reflecting time incurred in unrelated matters are both reasonable and appropriate. Where  
26 appropriate, an apportionment has been made to reflect the foregoing. Unredacted copies of  
27 the Statements will be made available to the Court to review in camera upon request.

28 9. I am aware that the Homeowners have either already paid, or have a genuine

1 financial obligation to pay, the total charges set forth in the Professional Services Statement.

2 10. I am aware from my review of the records that, since August 1, 2021, the  
3 Homeowners have incurred a total of \$96, 843.34 for legal services (as more particularly  
4 itemized in the attached Professional Services Statement) in this matter as reflected on the  
5 attached billing records.

6 11. The Homeowners have incurred a total of \$446.11 in costs expended in this matter.

7 12. The Homeowners therefore request a fee award totaling **\$97,289.45** for their  
8 efforts to force the Defendant to quiet title to their respective properties by removing the  
9 invalid short-term rental prohibition contained in the First Amendment from the public record  
10 and, thereby stopping the encumbrance of their respective properties by the same Defendant.

11 13. I respectfully submit that the costs and professional legal services set forth were  
12 actually, reasonably, and necessarily incurred in this matter. I respectfully submit that no time  
13 spent was wasted, inappropriate, or unnecessary based on my review of the records and  
14 knowledge of the proceedings. Further, I respectfully submit that the attorneys' fees charged  
15 are reasonable under the relevant considerations as set forth in ER 1.5 of the Arizona Rules  
16 of Professional Conduct, Supreme Court Rule 42, as adopted by the Arizona Supreme Court.

17 14. I swear under penalty of perjury that the above is true and accurate.

18 **DATED** this 4th day of October 2022.

19  
20 DYER BREGMAN & FERRIS, PLLC.

21 BY /s/ Stockton D. Banfield  
22 Stockton D. Banfield  
23 Charles M. Dyer  
24 Attorneys for Plaintiffs

25 ////  
26 ////  
27 ////  
28 ////

**DYER BREGMAN & FERRIS, PLLC**

3411 N. 5th Avenue, Suite 300  
Phoenix, Arizona 85013-3811  
(602) 254-6008 - [www.dbfzlaw.com](http://www.dbfzlaw.com)

1 ORIGINAL electronically filed via TurboCourt  
2 This 4th day of October, 2022.

3 COPIES emailed and mailed  
4 This 4th day of October, 2022 to:

5 Jack Cunningham  
6 Jim Csontos  
7 JENNINGS HAUG KELEHER McLEOD LLP  
8 2800 North Central Avenue, Suite 1800  
9 Phoenix, Arizona 85004  
10 Attorneys for Defendant

11 By: /s/ Kay Spates  
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# **EXHIBIT A**



**DYER BREGMAN  
& FERRIS, PLLC**

3411 N. 5th Avenue  
Suite 300  
Phoenix, AZ 85013-3811  
Phone: (602) 254-6008  
Fax: (602) 257-4276  
www.dbfazlaw.com

Sender's E-mail Address:  
sdb@dbfazlaw.com

**LEGAL SERVICES AGREEMENT BETWEEN  
BALD EAGLE RETREAT, LLC  
SIGNED BY  
AMY BHOLA, THE CLIENT AGENT  
AND  
DYER BREGMAN & FERRIS, PLLC**

The Arizona Supreme Court requires that all legal service agreements be confirmed in writing. The following information is provided to satisfy that requirement. Please discuss with us any provision that you do not understand or accept.

**Entity Clients:** Dyer Bregman & Ferris, PLLC has agreed to represent Bald Eagle Retreat, LLC as defined herein. Because Client is an entity, not an individual person, Bald Eagle Retreat, LLC consents to Dyer Bregman & Ferris, PLLC communicating with Amy Bhola as the authorized representative for Bald Eagle Retreat, LLC who may direct the legal matter, receive Bald Eagle Retreat, LLC's copy of the file, and authorize decisions for Bald Eagle Retreat, LLC. If Bald Eagle Retreat, LLC changes the Client Agent to someone else or in addition to Amy Bhola, a duly authorized constituent of Bald Eagle Retreat, LLC must notify Dyer Bregman & Ferris, PLLC in writing of such change. Amy Bhola understands that our communications with him/her are for the benefit of Bald Eagle Retreat, LLC and our Firm does not represent Amy Bhola in his/her individual capacity, unless we provide a separate Legal Service Agreement for Amy Bhola (individually) and conflict waiver with Bald Eagle Retreat, LLC.

**1. CONFIDENTIALITY & AUTHORIZATION TO RELEASE INFORMATION:**

- (a) Information you provide to us, our communications, and our work product are confidential under Ethical Rule 1.6, Rule 42, Rules of the Arizona Supreme Court and are subject to the attorney-client privilege statute ARS § 12-2234.

Charles M. Dyer  
Mark A. Bregman, CAP\*\*  
Scott R. Ferris  
Khalil C. Saigh  
Kelly L. Kral

Bridget O'Brien Swartz, CELA<sup>1</sup>, ACTEC\*\*  
Robert L. Beckett  
Michelle A. Booge  
Carla M. Miramontes

Scott C. Hodges  
Christine Tasopoulos  
Stockton D. Banfield

*Of Counsel*  
James B. Crook, Jr.  
Richard Keyt  
Richard C. Keyt\*\*  
Sergio Jasso

*In Memory*  
Charles J. Dyer  
(1935-2009)  
Sherman R. Bendalin  
(1941-2020)

\*Chartered Advisor in Philanthropy

<sup>1</sup>Certified Elder Law Attorney by the National Elder Law Foundation

\*\*The American College of Trust and Estate Counsel

\*\*Also Licensed in California



- (b) You authorize us to release information in our discretion to third parties who demonstrate a need to know.

Initials: AB \_\_\_\_\_

2. **JOINT REPRESENTATION:**

Client acknowledges that it is a member of a group of homeowners (collectively referred to as "Homeowners") suing the Shores at Rainbow Lake Community Association and Rainbow Cove at the Shores. The Homeowners consists of the following entities and individuals:

1. 854 Pine Creek, LLC
2. Bald Eagle Retreat, LLC
3. Verranzanno Bay, LLC
4. Steven & Sandra Kernagis
5. 1501 Rainbow View, LLC
6. Hideaway Rentals, LLC
7. Lakeside Family Investments, LLC
8. Gordon & Liliana Gross
9. Oasis Paradise Properties, LLC

The Client understands that all work will be performed on behalf of the Homeowners and any work product prepared belongs to the Client and the Homeowners collectively.

3. **SCOPE OF REPRESENTATION:**

Representing Homeowners in litigation against the Shores at Rainbow Lake Community Association, including but not limited to any Preliminary Injunction Hearing and any appeal thereof (hereinafter the "Litigation").

4. **HOURLY FEE:** You have retained Dyer Bregman & Ferris, PLLC on an hourly basis. You agree to pay to Dyer Bregman & Ferris, PLLC, attorneys' fees as per the attached fee schedule. In order to begin work on your Matter, we must receive an advance fee deposit of **\$25,000.00** as an advance of attorneys' fees and costs, which will be deposited into the firm's Trust Account. Invoices will be sent to you monthly and those balances will be deducted from your advance fee deposit. This advance fee deposit is not a flat fee or estimate of the total amount of fees for this Matter – this is only an advance and we may require that you replenish this deposit back to the full amount of the original deposit, if the balance falls below **\$2,500.00**.

No guarantee has been made about the amount of time needed to complete this Matter, as many factors may contribute to the complexity and time it takes, including factors outside of our control.



Client understands that the Homeowners have designated Amy Bhola and Ben Jones (“Representatives”) as designated representatives of the group. Client will receive itemized copies of the bill; however, the Representatives will be the responsible party for managing funds and paying the monthly invoices.

5. **MODIFICATION OF FEE SCHEDULE:** You understand that fees are subject to change and hereby consent to any such changes. We agree to notify you in writing of such changes at least thirty (30) days in advance of implementation of new rates.
6. **TIME:** Billable time includes, but is not limited to, such activities as office conferences, telephone calls, drafting and reviewing correspondence, research, investigation, preparation of court pleadings, motions, or other legal papers, court appearances, travel, review of files, communications with other parties and witnesses, preparation for and attendance at depositions, and drafting and reviewing emails. The attorney may associate or employ other attorneys, paralegals, office assistants, or other experts to aid in this Matter. Time is recorded in six (6) minute increments or one-tenth (1/10) of an hour entry.
7. **COSTS AND EXPENSES:** In addition to payment of attorneys’ fees, you will pay all Court costs and necessary out-of-pocket expenses such as filing fees, service of process fees, clerk’s fees, court reporter fees, recording fees, credit card processing fees, copying, long-distance telephone, out-of-town travel, postage, express or certified mail, computer research, delivery service, experts, psychologists, etc., incurred by us on this matter. Costs are not refundable under any circumstance.
8. **CLIENT’S RESPONSIBILITIES:** We cannot effectively represent you without your cooperation and assistance. You agree to cooperate fully with us and to promptly provide all information known or available to you that is relevant to this Matter. Your obligations include timely providing of requested information and documents, cooperating in scheduling and related matters, responding timely to telephone calls and correspondence, and informing us of changes in your address, telephone numbers and e-mail address. It is important that you retain all communications from and to us, including e-mails and attachments to e-mails.
9. **CONFLICT OF INTEREST (IF APPLICABLE):** In the event a conflict of interest could arise due to the concurrent representation of multiple parties, a Conflict of Interest Waiver shall be signed by the parties and incorporated herein by reference.
10. **INTEREST ON DELINQUENT ACCOUNTS:** All bills are due upon presentment and you will pay interest on all unpaid balances at the rate of eighteen percent (18%) per annum after thirty (30) days.
11. **WITHDRAWAL FROM REPRESENTATION:** If your bill is not paid within thirty (30) days of presentment, you agree that your attorney may withdraw from



representation of the Homeowners and your signature(s) below constitutes consent to same.

12. **COLLECTION OF DELINQUENT ACCOUNTS:** If a lawsuit is commenced to collect any unpaid amounts due hereunder, you will pay additional attorneys' fees and expenses incurred in same. You understand that your account may be sent to a collection agency should the account become more than ninety (90) days delinquent. You further understand that a collection agency can place an entry upon your credit report once the account is sent to such agency.

13. **JOINT AND SEVERAL LIABILITY:** The Client understands that at the conclusion of the Litigation there is a potential that an attorneys' fees award could be levied against the Homeowners and each Homeowner is jointly and severally responsible for the attorneys' fees amount. The Homeowners have agreed amongst themselves that any award of attorneys' fees will be split equally between the Homeowners and if one Homeowner does not pay it is liable to the other Homeowners for its equal share of the attorneys' fees award. The Homeowners further understand that if the Homeowners received an attorneys' fees award, then each Homeowner will be reimbursed the amount of attorneys' fees they have invested in to the Litigation, if possible. If the court does not award the full amount of attorneys' fees, then the Homeowner is entitled to the percentage share of the award based upon the amount of money paid by the Client prior to and during the Litigation.

Initials: ASB ASB

14. **GENERAL TERMS AND CONDITIONS:** The attached General Terms and Conditions are included in this Legal Services Agreement.

**REVIEWED, ACCEPTED, AND APPROVED:**

Bald Eagle Retreat, LLC

Amy Bhola  
Amy Bhola  
Client Agent

11/22/21  
Date

DYER BREGMAN & FERRIS, PLLC

By: Stockton D. Banfield  
Stockton D. Banfield  
For the Firm



## GENERAL TERMS AND CONDITIONS

The following general terms and conditions are incorporated into each Legal Services Agreement with **DYER BREGMAN & FERRIS, PLLC**.

1. **TERMINATION OF REPRESENTATION AND POST-REPRESENTATION MATTERS:**
  - (a) Either party may terminate the representation at any time, subject to the Firm's obligations under the Rules of Professional Conduct.
  - (b) Unless previously terminated, our representation will terminate upon completion of the services described in this Legal Services Agreement.
  - (c) After termination, Dyer Bregman & Ferris, PLLC has no continuing obligation to represent you, unless you retain us to provide additional advice or services.
2. **OUTSIDE LAWYERS:** Should it become necessary to associate with another lawyer or law firm to assist in the representation, we will inform you immediately in writing. We will only associate with outside counsel if you agree in writing to the participation of each lawyer/law firm. We will identify each lawyer or law firm which we believe should participate in the representation and whether they will assume joint responsibility for the representation or will perform certain services for which they will receive a proportionate amount of the total legal fee. We assure you, with or without associating with another lawyer or law firm, the total fee will be reasonable. The Client understands that Rick Carter and Matthew Klopp of the firm Wong and Carter, PC will be associating with this firm during the Litigation however, their firm will be paid by Dyer, Bregman, & Ferris, PLLC, from the existing retainer. All statements from Wong and Carter, PC will be provided to the Homeowners upon receipt.
3. **ADDITIONAL CHARGES:** If you seek additional advice not directly related to the work described in this Legal Services Agreement during or after completion of the included services or work, you agree to pay for that legal service at the prevailing hourly rate described on the attached schedule upon rendition of an invoice.
4. **THIRD PARTY PAYOR:** Your legal fees may be paid by a third party. If we receive payment from a third party, on your behalf, this clause will apply. Both you and the third party must understand that our ethical duties of confidentiality and communications are owed to you, not to the person paying the fees. All decisions regarding the legal status and strategy of your case shall be discussed only with you unless you give express informed consent to disclose information to the third party, which you understand may waive both attorney/client privilege and confidentiality. Unless otherwise authorized by you in writing, only you may direct the objectives



of the representation. Please do not forward our detailed invoices to the third party, as that also may waive confidentiality and attorney/client privileges, making the information available to opposing parties. Even if a third party has guaranteed payment of fees, you remain jointly and severally liable for the payment of all amounts owed to Dyer Bregman & Ferris, PLLC.

If a third party makes payment, and at the end of the representation, there is a refund due with respect to such third-party payment, the amount to be refunded will be paid directly to the third party. By signing this Legal Services Agreement, you acknowledge that Dyer Bregman & Ferris, PLLC may receive payments on your account from a third party but that we shall not communicate any information about the representation to the third party.

By signing as a guarantor to this Legal Services Agreement the Third Party acknowledges that they are responsible for payment of fees but may not direct the representation of you.

5. **ELECTRONIC COMMUNICATIONS:** We communicate from time to time with clients via mobile telephone, and e-mail. No form of communication is completely secure, and these forms of communication have some risk of improper interception even though we maintain reasonable security measures to assure the confidentiality of your information. We retain many file documents in electronic format only and these may be stored on a secure separate third-party server, located in the United States. If you have any heightened electronic data security requirements (such as for government clearances), please notify us immediately. Accordingly, unless you instruct us that you prefer to receive only a paper copy in the mail and do not wish to communicate by e-mail, we will send you each document that is relevant to your case by e-mail as a scanned document in "pdf" format. You are responsible for providing us with an e-mail address that you want us to use for correspondence related to the representation. You should check that e-mail address regularly. We will assume that third parties (e.g., employers or family members) do not have access to that e-mail address so you can receive confidential correspondence from us at that address. We also will assume that you are receiving and reviewing our e-mails at that address unless you alert us to an issue. Please be certain that your e-mail filters do not block e-mails from our office and that the allowable size of incoming e-mails is sufficient to accept e-mails from us with attachments.
6. **ELECTRONIC FILES:** You agree that we may maintain your records electronically and by use of digital images. We do not retain paper copies of documents, unless required by rule or statute.

During our engagement, you may obtain paper copies of documents in the file maintained by the firm with respect to your case (whether electronic or in paper



form) upon request to us, with reasonable notice. We reserve the right to charge a reasonable fee for making paper copies that are in addition to the electronic copies of documents already provided to you, including a per page charge not to exceed thirty cents (\$0.30) per page.

7. **YOUR LEGAL FILE:** Your legal file includes substantive things you give us and substantive documents we receive or create for you during the representation. As noted above, you will receive most documents in electronic format as attachments to emails we send to you. Please retain all emails sent to or received from us as they constitute your copy of your file. Please only provide us with copies of documents – unless we expressly request an original paper document.

Before or within a reasonable time after the completion of the included services and work, or the termination of this Legal Services Agreement, we will return any original documents you gave to us, original documents we created for you, and original documents we received on your behalf.

You agree to take reasonable measures to safeguard your own legal file, including the electronic documents and emails sent to you. Therefore, at the end of the representation, you will have a complete file, including any original documents.

After thirty (30) days has passed since the completion of the included services or work, we may scan our copy of the paper file, store the information electronically, and shred our paper file.

For a period of five (5) years after the completion of the Matter, we will retain our copy your electronic file. At any time during this five-year period you may request a second electronic copy of your file. If you desire that we provide you with a second paper copy or electronic file during this five-year period, we will do so, but we reserve the right to charge a reasonable fee for making paper copies or transmitting the electronic file, copies of which we have previously provided you during the course of representation including a per page charge not to exceed thirty cents (\$0.30) per page, plus postage.

After five (5) years we may destroy the electronic copy of your file without further notice.

There is an exception to the above provisions regarding destruction of our copy of your electronic file: We will keep indefinitely, in electronic format, a copy of estate planning documents we have prepared and which you have executed including Last Wills and Testaments, Trusts, and Powers of Attorneys.

8. **COMMUNICATIONS:** We try to return phone calls within two (2) business days from the date of the call and sometimes that may mean a legal assistant will respond, as we deem appropriate. We encourage e-mail communications. We will not



communicate confidential information about the representation to third persons, including your advisors or family members, unless you specifically direct us to do so, understanding that such communications may waive our attorney-client privilege.

9. **ARBITRATION OF FEE DISPUTES:** We strive to not have billings contain any surprises. If you have a question about a fee or cost, please contact us to discuss. If we cannot resolve the matter informally, you agree to resolve that dispute through the State Bar's Fee Arbitration Program, in Phoenix.
  
10. **ADVICE REGARDING THIS FEE AGREEMENT:** We are not acting as your attorney with respect to this Legal Service Agreement. If you wish to be advised on whether you should enter into this Legal Services Agreement, we recommend you consult with an independent attorney of your choice.



**DYER BREGMAN  
& FERRIS, PLLC**

3411 N. 5th Avenue  
Suite 300  
Phoenix, AZ 85013-3811  
Phone: (602) 254-6008  
Fax: (602) 257-4276  
www.dbfazlaw.com

Sender's E-mail Address:  
cmdyer@dbfazlaw.com

**2021 FEE SCHEDULE**

Mark A. Bregman	450.00 per hour
Richard Keyt	405.00 per hour
*Bridget O'Brien Swartz	400.00 per hour
Scott R. Ferris	385.00 per hour
Charles M. Dyer	385.00 per hour
Robert L. Beckett	385.00 per hour
Khalil Chuck Saigh	375.00 per hour
Kelly L. Kral	375.00 per hour
James B. Crook, Jr.	350.00 per hour
Michelle A. Booge	325.00 per hour
Richard C. Keyt	325.00 per hour
Stockton D. Banfield	325.00 per hour
Christine Tasopulos	315.00 per hour
Scott Hodges	315.00 per hour
Carla Miramontes	315.00 per hour
Sergio Jasso	285.00 per hour
Paralegal/Legal Assistant	175.00 - 210.00 per hour
Staff/Administrative	75.00 - 175.00 per hour
Copies	.30/page
Facsimile	.50/page

\*Rate is \$385.00 per hour for administration of estate/guardianship/conservatorship/trust matters.

**NOTE: EXPERT WITNESS ATTORNEY RATE IS \$500.00 PER HOUR**

Charles M. Dyer	Bridget O'Brien Swartz, CELA <sup>†</sup> , ACTEC <sup>††</sup>	<i>Of Counsel</i>	<i>In Memory</i>
Mark A. Bregman, CAP <sup>**</sup>	Robert L. Beckett	James B. Crook, Jr.	Charles J. Dyer
Scott R. Ferris	Michelle A. Booge	Richard Keyt	(1935-2009)
Khalil C. Saigh	Carla M. Miramontes	Richard C. Keyt <sup>**</sup>	
Kelly L. Kral		Sergio Jasso	Sherman R. Bendalin
			(1941-2020)

•Chartered Advisor in Philanthropy    <sup>†</sup>Certified Elder Law Attorney by the National Elder Law Foundation    <sup>††</sup>The American College of Trust and Estate Counsel    <sup>\*\*</sup>Also Licensed in California

# EXHIBIT B

**WONG 和 CARTER** An Arizona Professional Corporation

Counselors & Attorneys

**Phoenix**

Phoenix Corporate Center  
3003 N. Central Avenue  
Suite 1000  
Phoenix, Arizona 85012  
Telephone 602 287 3360  
Facsimile 602 287 3365

**Scottsdale**

94 Hundred Corporate Center  
9375 E. Shea Boulevard  
Suite 100  
Scottsdale, Arizona 85260  
Telephone 480 214 9586  
Facsimile 480 214 9501

**Yuma**

The Historic Martinez House  
106 S. Madison Avenue  
Suite 2  
Yuma, Arizona 85364  
Telephone 928 752 0094  
Facsimile 928 752 0097

**Rick K. Carter**

**Admitted in Arizona  
& California**

***RCarter@WongandCarter.com***  
***www.WongandCarter.com***

Please Respond to Phoenix

December 2, 2021

*Via email only to [sdb@dbfazlaw.com](mailto:sdb@dbfazlaw.com)*

**Stockton D. Banfield, Esq.**  
**for Various Rainbow Cove Homeowners**  
**DYER BREGMAN AND FERRIS, LLC**  
**3411 North 5th Avenue**  
**Suite 300**  
**Phoenix, Arizona 85013**

**ENGAGEMENT AGREEMENT**

Dear Stockton,

We are very pleased that you have selected Wong & Carter, P.C. ("Company") to assist in the representation of the following identified homeowners at Rainbow Cove with respect to the anticipated litigation involving The Shores at Rainbow Lake Community Association and Rainbow Cove at the Shores Owners Association:

1. 854 Pine Creek, LLC
2. Bald Eagle Retreat, LLC
3. Verranzanno Bay, LLC
4. Steven & Sandra Kernagis
5. Trevin Hatch
6. Hideaway Rentals, LLC
7. Lakeside Family Investments, LLC
8. Gordon & Liliana Gross
9. Oasis Paradise Properties, LLC

It is understood that other homeowners may be added or removed from this engagement going forward. This engagement will be amended by exchange of email communications should there be changes to the group of homeowners being represented. Additionally, you have represented that you have authority from the all of the identified homeowners pursuant to your engagement with them to contract associate counsel to serve as co-counsel in this matter. We thank you for your expression of trust and confidence. Below I will refer to the identified homeowners jointly as "Client" or "you" with the understanding that all invoices for services will be directed to you, Stockton, for payment. Otherwise, this engagement letter will set forth the scope of our firm's services relative to the referenced and anticipated litigation.

If you have any questions about this letter, or if you would like to discuss possible modifications, please contact me.

1. *Client; Scope of Representation.* For purpose of this letter of engagement ("Agreement"), you are our firm's Client in the matter referred to herein. We will provide legal services within the scope described, meaning service as associated co-counsel.

2. *Term of Engagement.* Either you or we may terminate the engagement at any time for any reason by written notice, subject to applicable rules of professional conduct governing the attorney-client relationship. In the event that we terminate the engagement, we will take reasonably practical steps to protect your interests in all involved matters. If you terminate our services, you will promptly pay all fees, charges and expenses incurred prior to the date of termination and for any work required to effect a transition to new counsel. We reserve the right to withdraw from representing you if, among other things, you fail to honor the terms of this engagement letter, including nonpayment of our invoices, or if you fail to cooperate or follow our advice on a material matter, or we become aware of any fact or circumstance that would, in our view, render our continuing representation unlawful or unethical. Unless previously terminated, our representation will terminate upon sending you our final invoice for services rendered. If you request, we will return the original papers and property to you promptly. Consistent with our need to ensure payment of any outstanding invoices, we may retain copies of the documents. We will keep our own files, including attorney work product, pertaining to our engagement. For various reasons, including minimization of unnecessary storage expenses, we may destroy or otherwise dispose of the documents and materials within a reasonable time after termination of the engagement.

3. *Client Responsibilities.* We will provide legal services to you in accordance with this letter and will rely upon information you provide to us. We will keep you reasonably informed of progress and development, and respond to inquiries from your office. In order to enable us to provide the services set forth in this letter, you will disclose

fully and accurately all facts and keep us apprised of all developments relating to the matters involved. You are to pay our invoices in accordance with this engagement letter. You and your staff will cooperate fully with us and be available to attend meetings, conferences, hearings and other proceedings on reasonable notice, and you will stay fully informed on all developments relating to involved matters.

4. *Staffing.* I will be the attorney primarily responsible for the representation and billing. It is our objective to provide the highest quality legal services in an efficient, economical manner. As a result, we may involve other attorneys who may possess the experience or knowledge appropriate to the task at hand. If you have any questions or comments about our services, staffing, billings or other aspects of our representation of you, please contact me.

5. *Fees, Advance Deposit, and Expenses.* Our fees are based primarily upon the billing rate for each attorney and legal assistant devoting time to the involved assignment. All attorneys and legal assistants have an hourly billing rate based generally on their experience and special expertise. I will review your invoices personally before they are delivered to you. The fee for services provided in this matter is based upon the rate of \$350.00 an hour for my services, and \$300.00 an hour for the services rendered by any other attorneys at Wong & Carter, PC. The hourly rate multiplied by the time spent on the assignment, measured generally in tenths of an hour, is the primary basis for determining fees to be charged. The firm will not require an advance fee from you at this time. The firm simply requires that you pay each invoice within 30 days of issuance.

We include separate charges on our billing statement such as photocopying, messenger and delivery services, computerized research, travel, facsimile and search and filing fees. We do not advance funds to pay fees and expenses generally (such as consultants, appraisers, and local counsel). The provider of these services will bill you directly. We generally send invoices to you on a monthly basis, which helps to keep you informed of the time devoted to and the progress of involved assignments. Payment is due upon receipt. We will charge interest at the rate of 1% per month (12% per annum) on any invoice that remains unpaid for 30 days. You agree to bear the costs we incur in collecting overdue amounts, including reasonable attorneys' fees and all other costs. If any invoice remains unpaid for more than 30 days, we may cease performing services until we arrange with you for payment of outstanding and future invoices. We may withdraw from representing you if you do not pay the invoice(s). All other terms and conditions set forth in this Agreement apply.

6. *Limited Liability.* Our firm is a professional corporation. On this basis, no director, officer or shareholder of the firm has personal liability for any debts or liabilities of the firm except as otherwise required by law, and except that each shareholder can be personally liable for his or her own malpractice and for the malpractice of persons acting

under his or her actual supervision and control. Please call me if you have any questions about our status as a professional corporation.

7. *Disclaimer of Result Guarantee.* This engagement Agreement is not contingent upon the ultimate outcome of your legal needs. Sometimes, the final result is not in accordance with a client's hopes and expectations. Nothing in this agreement and nothing in our statements to you will be construed as a promise or guarantee about the outcome of your legal matters or assignments. We make no such promises or guarantees. Our comments about the outcome of your matter, if any, are mere expressions of opinion only.

8. *Conflict & Conflict Waiver.* We represent many other companies and individuals. It is possible that during the time we represent you, some of our present or future clients will have disputes or transactions with you and/or your affiliates. You agree that we may continue to represent or may undertake in the future to represent existing or new clients in any matter that not substantially related to our work on assignments even if the interests of such clients in those matters are directly adverse to those of yours.

We agree, however, that your prospective consent to conflicting representation contained in this paragraph shall not apply in any instance where, as a result of our representation of you, we have obtained proprietary or other confidential information, that, if known to the other client, could be used by that client to the material disadvantage of your business. We will not disclose to the other client(s) any confidential information received during the course of our representation of you.

9. *Electronic Communications.* We have adopted methods of communication, from time to time, with our clients utilizing telecopiers, mobile telephones, and e-mail. These forms of communication are not completely secure against unauthorized access. There is some risk of inadvertent disclosure and loss of attorney-client privilege in using these forms of communication because they do not ensure the confidentiality of their contents. If you object to our using any one or more of these forms of communication, please let me know and we will attempt to honor that request.

This letter Agreement contains the entire agreement between Client and the firm, and its attorney, regarding the engagement and the fees, charges and expenses to be paid. If you are in agreement with the terms of this letter, please sign below and return this Agreement to me.

Thank you very much.

Sincerely,

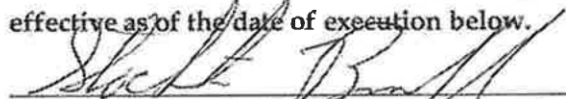
WONG & CARTER, P.C.

*Rick K. Carter*

Rick K. Carter  
Attorney at Law

ACCEPTED AND AGREED:

CLIENTS VIA AUTHORIZED COUNSEL: The undersigned agrees to engage RICK K. CARTER and WONG & CARTER, P.C. pursuant to the terms set forth in this Agreement, effective as of the date of execution below.

  
\_\_\_\_\_  
Stockton D. Banfield, Esq. for the identified homeowners at Rainbow Cove

This 16 day of December, 2021

# EXHIBIT C

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Wong & Carter, PC  
3003 N. Central Avenue, Suite 1000  
Phoenix, Arizona 85012

Stockton D. Banfield, Esq.  
Rainbow Cove Homeowners  
3411 N. 5th Ave., Ste 300  
c/o Stockton D. Banfield, Esq./Dyer Bregman & Ferris,  
LLC  
Phoenix, AZ 85013

Date: 1/12/2022

Regarding: Rainbow Cove Homeowners/HOA  
Invoice No: 07899

Make checks payable to "Rick K. Carter, Attorney at Law"

**Services Rendered**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charges</u>
12/13/2021	MAK	Teleconference with R. Carter and S. Banfield regarding case status and [REDACTED]	0.50	\$300.00	No Charge
12/13/2021	RKC	Preparation/receipt of email communication s to/from co-counsel S. Banfield regarding scheduling of a teleconference to discuss status and [REDACTED] [REDACTED] Teleconference with same and M. Klopp regarding same.	0.60	\$350.00	\$210.00
12/15/2021	RKC	Monitor email communications between co-counsel S. Banfield and M. Klopp forwarding materials concerning the history of the Rainbow Cove HOA disputes; Brief review of the forwarded materials.	0.70	\$350.00	\$245.00
12/16/2021	JRR	Review and analyze documents sent by M. Klopp and send findings and conclusions to M. Klopp; Conference with M. Klopp regarding necessary research and review; Review Shores CC&R provisions relating to leasing and amendment.	1.40	\$250.00	\$350.00

12/16/2021	RKC	Monitor email communications between co-counsel S. Banfield and M. Klopp regarding and forwarding additional file materials for review, and concerning misc. items/issues; Brief review of forwarded file materials.	0.50	\$350.00	\$175.00
12/17/2021	JRR	Conference with M. Klopp regarding [REDACTED] [REDACTED] Review and analyze Kalway v. Calabria majority holding and dissent; Draft findings and summary of legal research and send to M. Klopp.	2.10	\$250.00	\$525.00
12/17/2021	JRR	Conference with M. Klopp regarding Kalway v. Calabria case and necessary further research.	0.40	\$250.00	\$100.00
12/17/2021	MAK	Conference with Associate regarding research concerning [REDACTED] [REDACTED] Teleconference with R. Carter and S. Banfield regarding strategy for litigation.	0.80	\$300.00	\$240.00
12/17/2021	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield regarding strategy, [REDACTED] [REDACTED] Teleconference with same and M. Klopp regarding same; Conference with M. Klopp regarding same	0.90	\$350.00	\$315.00
12/19/2021	RKC	Monitor email communications between client group representative A. Bholra and co-counsel S. Banfield regarding [REDACTED] [REDACTED]	0.20	\$350.00	No Charge
12/20/2021	JRR	Conference with M. Klopp regarding case law relating to CC&R amendments; Review Dropbox and Google drive documentation and information; [REDACTED] [REDACTED]	1.60	\$250.00	\$400.00

12/20/2021	JRR	Draft email containing findings regarding [REDACTED] [REDACTED]	0.40	\$250.00	\$100.00
12/20/2021	JRR	Review and analyze CC&Rs and amendments; Conference with M. Klopp regarding [REDACTED] [REDACTED]	1.80	\$250.00	\$450.00
12/20/2021	MAK	Conference with Associate regarding review of client documents and HOA governance documents and amendments.	0.10	\$300.00	No Charge
12/20/2021	RKC	Conference with M. Klopp regarding the nature of the clients' claims in the Rainbow Cove matters.	0.20	\$350.00	\$70.00
12/21/2021	JRR	Conduct legal research regarding [REDACTED] [REDACTED] Review Shores and Cove CC&Rs for [REDACTED] [REDACTED]	2.60	\$250.00	\$650.00
12/21/2021	JRR	Conference with M. Klopp regarding [REDACTED] [REDACTED] Begin drafting demand letter.	1.70	\$250.00	\$425.00
12/21/2021	JRR	Research, review, and analyze Cove CC&Rs; Research, review, and analyze [REDACTED] Review Association bylaws; Conference with M. Klopp regarding [REDACTED] [REDACTED]	2.50	\$250.00	\$625.00
12/21/2021	MAK	Teleconference with S. Banfield regarding case status and strategy; Conference with Associate regarding [REDACTED] [REDACTED]	2.70	\$300.00	\$810.00

[REDACTED]  
[REDACTED] Conference with Associate  
regarding [REDACTED]  
[REDACTED]

12/22/2021	JRR	Review Dreamland for demand letter; Draft demand letter; Begin creating timeline of events.	2.60	\$250.00	\$650.00
12/22/2021	JRR	Conference with M. Klopp regarding open meeting statute and ARS 33-420 (C) and applicability to instant case for use in demand letter.	0.10	\$250.00	\$25.00
12/23/2021	JRR	Compile timeline of events for litigation, sorting through Google drive and Dropbox documentation.	0.80	\$250.00	\$200.00
12/23/2021	MAK	Conference with Associate regarding strategy for amending draft pleading and motion; Conference with R. Carter regarding 33-420/quiet title demand letter strategy.	0.30	\$300.00	\$90.00
12/23/2021	RKC	Receive and review email communication from co-counsel S. Banfield regarding and forwarding the draft Complaint and related documents; Brief review of same.	0.60	\$350.00	\$210.00
12/23/2021	JRR	Conference with M. Klopp regarding strategy for amending preliminary injunction; Review and analyze preliminary injunction, making notes for necessary revisions.	1.50	\$250.00	\$375.00
12/26/2021	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield, M. Klopp and client group representative A. Bhola regarding strategy relative to seeking injunctive relief and concerning the scheduling of teleconferences to discuss same.	0.20	\$350.00	\$70.00
12/27/2021	JRR	Begin revision of Motion for Preliminary Injunction; Research Kalway arguments further.	1.10	\$250.00	\$275.00

12/27/2021	JRR	Conference with M. Klopp regarding phone call with homeowners and litigation strategy; Research Association authority to fine in statute and CC&Rs; Conference with M. Klopp and R. Carter regarding ARS 33-1242 and 1803; Conference with M. Klopp regarding Cove and Shores Declaration inconsistencies in defining single family.	1.80	\$250.00	\$450.00
12/27/2021	JRR	Conference with M. Klopp regarding potential non-existence of original Shores Declaration and necessary inquiries to determine whether such a Declaration was ever properly recorded and potential impact on litigation strategy	0.80	\$250.00	\$200.00
12/27/2021	JRR	Conference with M. Klopp and print material for meeting with homeowners; Conference with M. Klopp regarding plat and whether HOA President can sign amendment and necessary research related thereto; Conference with M. Klopp regarding Section 2.13 of Shores Declaration and Track Declaration; Review Association Bylaws regarding signing for amendments.	0.80	\$250.00	\$200.00
12/27/2021	MAK	Multiple conferences with Associate and R. Carter regarding strategy for litigation; Review Navajo County Recorder's website for plat maps; Continue evaluation of community governance documents to outline strategy for quiet title and injunctive relief; Teleconference with R. Carter and S. Banfield regarding strategy pre-call with client representatives; Teleconference with R. Carter, S. Banfield, and client representatives regarding case strategy.	4.80	\$300.00	\$1,440.00
12/27/2021	RKC	Exchange email communications, and multiple conferences. with M. Klopp and J. Rainey regarding strategy going forward to seek interim injunctive relief and related items/issues; Participate in multiple teleconferences with co-counsel S. Banfield, M. Klopp and	2.80	\$350.00	\$980.00

		multiple client representatives regarding the circumstances of the dispute, claim analysis, and strategy going forward.			
12/28/2021	JRR	Review CC&Rs for attorney fee shifting provision for inclusion in Complaint and conference with M. Klopp regarding findings thereof; Conference with M. Klopp regarding quiet title action statute, demand letter, and recording issues regarding Master Declaration; Review Dreamland Second Amended Complaint; Review Shores CC&R recording information and send finding to M. Klopp; Conference with M. Klopp regarding CC&R recording findings and preliminary injunction language; Revise preliminary injunction motion.	4.00	\$250.00	\$1,000.00
12/28/2021	MAK	Email to S. Banfield and A. Bhola regarding Arizona law on authority to fine under Restatement and outcome under Arizona law to clarify call with client representatives regarding strategy.	0.40	\$300.00	\$120.00
12/28/2021	RKC	Exchange email communications with M. Klopp regarding explaining the potential for fines to the clients from the HOA for short term leasing; Monitor email communications between M. Klopp, co-counsel S. Banfield and client group representative A. Bhola regarding same as well as concerning misc. items/issues.	0.40	\$350.00	\$140.00
12/29/2021	JRR	Continue drafting Motion for Preliminary Injunction/quiet title action	1.70	\$250.00	\$425.00
12/29/2021	JRR	Continue drafting Motion for Preliminary Injunction/quiet title action.	0.60	\$250.00	\$150.00
12/29/2021	JRR	Continue drafting quiet title action.	0.80	\$250.00	\$200.00
12/29/2021	JRR	Conference with M. Klopp and J. Wong regarding Shores CC&Rs record abnormalities and necessary procedures for quiet title action; Search Maricopa and Apache county records database for recorded Shores original declaration; Conference with M. Klopp	0.50	\$250.00	\$125.00

regarding findings from Maricopa and Apache county records database search.

12/29/2021	MAK	Telephone call to D. Walt regarding title search for historical CC&Rs for Rainbow Shores; Teleconference with S. Banfield regarding same and potential additional arguments to invalidate Shores restrictions.	0.20	\$300.00	\$60.00
12/29/2021	RKC	Monitor email communications between co-counsel S. Banfield and M. Klopp regarding the need for a litigation guaranty.	0.10	\$350.00	\$35.00
12/30/2021	JRR	Review and analyze quiet title action case law and legal strategy.	0.20	\$250.00	\$50.00
12/30/2021	JRR	Continue drafting quiet title action.	3.80	\$250.00	\$950.00
12/30/2021	MAK	Multiple conferences with Associate regarding strategy for preliminary injunction motion and pleading and legal arguments under Dreamland; Telephone call to D. Walt of Pioneer Title, left message; Email to S. Banfield regarding contacting B. and L. McJuncin for historical documents.	0.30	\$300.00	\$90.00
12/31/2021	JRR	Continue drafting quiet title action.	0.20	\$250.00	\$50.00
12/31/2021	JRR	Review email from M. Klopp regarding Nicdon case and review and analyze related materials; Review Nicdon Petition Appendix.	1.00	\$250.00	\$250.00

Total Fees \$14,500.00

Total New Charges

\$14,500.00

Previous Balance

\$0.00

Balance Due

\$14,500.00

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Wong & Carter, PC  
3003 N. Central Avenue, Suite 1000  
Phoenix, Arizona 85012

Rainbow Cove Homeowners  
3411 N. 5th Ave., Ste 300  
c/o Stockton D. Banfield, Esq./Dyer Bregman & Ferris,  
LLC  
Phoenix, AZ 85013

Date: 2/14/2022

Regarding: Rainbow Cove Homeowners/HOA  
Invoice No: 07997

Make checks payable to "Rick K. Carter, Attorney at Law"

**Services Rendered**






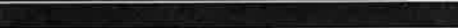

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charges</u>
1/03/2022	JRR	Draft quiet title notice letter.	0.60	\$250.00	\$150.00
1/03/2022	JRR	Conference with M. Klopp regarding Nicdon email and Nicdon Supreme Court Petition for review and discussed applicability to instant case; Conference with M. Klopp regarding original master declaration and call with L. McJunkin, and motion composition; Draft quiet title action; Draft quiet title notice letter.	4.70	\$250.00	\$1,175.00
1/03/2022	JRR	Review Kalway v. Calabria Ranch Arizona Supreme Court Petition for Review and other briefing; Conference with M. Klopp regarding documents dropped off by L. McJunkin, primarily with regard to the original declaration for the Shores.	0.70	\$250.00	\$175.00
1/03/2022	MAK	Teleconference with L. McJunkin, homeowner client, regarding [REDACTED] [REDACTED] Conference with Associate and R. Carter regarding status and strategy; Meeting with L. McJunkin to discuss [REDACTED] [REDACTED] Review historical community governance and sale	2.30	\$300.00	\$690.00

		documents to evaluate for potential use in case (either pleading/preliminary injunction motion stage or later).			
1/04/2022	JRR	Finish quiet title action draft and send to M. Klopp.	2.10	\$250.00	\$525.00
1/04/2022	JRR	Finish quiet title notice letter and send to M. Klopp; Conference with M. Klopp regarding quiet title action and Complaint.	2.00	\$250.00	\$500.00
1/04/2022	JRR	Conference with M. Klopp regarding Complaint and Motion revisions.	0.20	\$250.00	\$50.00
1/04/2022	JRR	Conference with M. Klopp regarding original shores declaration provisions and discuss whether changes relevant to instant case.	0.30	\$250.00	\$75.00
1/04/2022	MAK	Conference with Associate regarding status of demand and pleadings and related issues; Exchange emails with S. Banfield and A. Bhola regarding [REDACTED] [REDACTED] Work on draft Motion for Preliminary Injunction; Multiple conferences with Associate regarding same and status of Complaint revisions.	1.60	\$300.00	\$480.00
1/04/2022	RKC	Monitor email communications between client group representative A. Bhola and co-counsel S. Banfield regarding [REDACTED] [REDACTED] [REDACTED] Monitor email communications between S. Banfield and M. Klopp regarding preparation of the initial civil action filings and related items/issues.	0.30	\$350.00	\$105.00
1/05/2022	JRR	Revise Complaint; Conference with M. Klopp regarding Complaint revisions; Compile list of Navajo County judges; Compile documentation for utilization in motion and Complaint to send to M. Klopp.	4.50	\$250.00	\$1,125.00
1/05/2022	MAK	Conference with R. Carter regarding strategy for pleadings and demand and related issues; Work on drafts of Complaint, Motion for Preliminary	5.50	\$300.00	\$1,650.00

		Injunction, and quiet title demand and accompanying instrument of invalidity.			
1/05/2022	RKC	Receive and review multiple email communications from M. Klopp forwarding drafts of the Complaint, Motion for Preliminary Injunction and quit claim demand correspondence; Brief review of the forwarded drafts.	0.60	\$350.00	\$210.00
1/06/2022	JRR	Conference with M. Klopp regarding homeowner emails and discuss need for document indicating property ownership; Compile names of homeowners and send to M. Klopp; Conference with M. Klopp regarding letter sent to HOA and LSAs; Search for and compile deeds for ownership evidence and record.	2.00	\$250.00	\$500.00
1/06/2022	MAK	Numerous conferences with Associate regarding work on Complaint; Exchange numerous emails with client representatives and S. Banfield regarding same in preparation of quiet title demand and draft lawsuit filings; Conference with R. Carter regarding strategy for pleading claims and identify of parties.	1.30	\$300.00	\$390.00
1/06/2022	RKC	Monitor numerous email communications between client representatives A. Bholra, J. Zehring, co-counsel S. Banfield and M. Klopp regarding [REDACTED] [REDACTED] Brief review forwarded drafts of same; Preparation of email communication to same regarding strategy going forward; Conference with M. Klopp regarding status and strategy.	1.30	\$350.00	\$455.00
1/07/2022	JRR	Compile deeds for property involved in suit and create ownership matrix indicating owners of record for incorporation in pleadings and letter; Conference with M. Klopp regarding litigation strategy, revise pleadings and demand letter/notice with proper owners of record and other revisions, Conference with M. Klopp regarding	2.90	\$250.00	\$725.00

further revisions to demand letter,  
forward updated record owner list to R.  
Carter, send all revised pleadings to M.  
Klopp.

1/07/2022	MAK	Conference with Associate regarding updating allegations in draft Complaint regarding parties and ownership; Revise, work on, and finalize quiet title demand letter and instrument to invalidate First Amendment, along with draft Complaint and Motion for Preliminary Injunction; Email same to W. Ehrlich, counsel for HOA; Email to S. Banfield and R. Carter with same.	3.30	\$300.00	\$990.00
1/07/2022	RKC	Multiple conferences with M. Klopp regarding the draft Complaint and the quiet title demand; Monitor email communications between various client representatives and M. Klopp regarding same; Review the draft Complaint and quiet title demand.	0.70	\$350.00	\$245.00
1/08/2022	MAK	Receive and respond to emails from S. Banfield and J. Zehring regarding [REDACTED]	0.60	\$300.00	\$180.00
1/08/2022	RKC	Monitor email communications between client group representatives, A. Bholá and J. Zehring, and M. Klopp regarding [REDACTED]	0.20	\$350.00	\$70.00
1/09/2022	RKC	Monitor email communications between client group representative A. Bholá and co-counsel S. Banfield regarding [REDACTED] [REDACTED] Monitor email communications between S. Banfield and M. Klopp regarding same.	0.30	\$350.00	\$105.00
1/10/2022	JRR	Conference with M. Klopp regarding client emails and concerns.	0.30	\$250.00	\$75.00
1/10/2022	MAK	Monitor and exchange emails with all counsel and client representatives regarding [REDACTED]	0.40	\$300.00	\$120.00

		 Conference with R. Carter regarding status.			
1/10/2022	RKC	Monitor email communications between client group representative A. Bhola and M. Klopp regarding a variety of items/issues.	0.20	\$350.00	\$70.00
1/11/2022	MAK	Teleconference with S. Banfield regarding strategy issues for quiet title demand and upcoming litigation initiation.	0.50	\$300.00	\$150.00
1/12/2022	JRR	Conference with M. Klopp regarding necessary revisions to pleadings and other tasks.	0.40	\$250.00	\$100.00
1/12/2022	MAK	Conference with Associate regarding revisions to draft pleadings; Email to S. Banfield regarding strategy issues in litigation.	0.40	\$300.00	\$120.00
1/13/2022	JRR	Revise pleadings and review homeowner communications/suggestions regarding the same; Listen to Shores HOA meeting recordings and review HOA meeting notes; Conference with M. Klopp regarding revisions, emails, and Shores HOA meeting notes/recordings.	1.80	\$250.00	\$450.00
1/13/2022	MAK	Receive and review email from A. Bhola regarding   Conference with Associate regarding same and potential use in contemplated injunction motion practice.	0.30	\$300.00	\$90.00
1/13/2022	RKC	Receive and review email communication from client group representative A. Bhola regarding     Review the forwarded notes and recordings.	0.50	\$350.00	\$175.00
1/14/2022	RKC	Monitor email communications between client group representative A. Bhola and	0.20	\$350.00	\$70.00

co-counsel S. Banfield regarding [REDACTED]  
[REDACTED] review same;  
Receive and review copy of email communication from S. Banfield to attorney A. Karam regarding representation and identification of the named client/Plaintiffs and related items/issues.

1/18/2022	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield regarding confirmation of the entities to be named as parties and concerning the language needed for the confirming emails from clients.	0.20	\$350.00	\$70.00
1/21/2022	JRR	Conference with M. Klopp regarding matter updates and upcoming A. Bhola [REDACTED] Review emails forwarded by M. Klopp from clients and Conference with M. Klopp regarding the same [REDACTED] Conduct legal research regarding HOA authority to impose monetary penalties for CCR violations; Conference with M. Klopp regarding findings from legal research on HOA monetary penalty authority and inclusion of the same in quiet title action; Revise pleadings to include updated list of parties and incorporate findings regarding ARS 33-1806.01(D) and draft memorandum of positions for upcoming HOA hearing.	3.60	\$250.00	\$900.00
1/21/2022	MAK	Review emails regarding positions and strategy for upcoming HOA meeting to consider alleged rental restriction violation; Conference with Associate regarding research into fine authority under Arizona law for use at HOA meeting and potential use of meeting outcome in pending Complaint and injunction motion practice.	0.80	\$300.00	\$240.00
1/21/2022	RKC	Preparation/receipt of email communications with co-counsel S. Banfield and M. Klopp regarding appearing at A. Bhola's [REDACTED] Conference with M. Klopp regarding	0.40	\$350.00	\$140.00

		same.			
1/24/2022	MAK	Teleconference with S. Banfield prior to call with clients to discuss HOA meeting strategy; Teleconference with A. Bhola, L. McJunkin, and S. Banfield regarding [REDACTED] Email to counsel for HOA to advise of attendance of counsel for homeowners.	0.70	\$300.00	\$210.00
1/24/2022	RKC	Monitor email communications between M. Klopp and co-counsel S. Banfield regarding misc. items/issues; Conference with M. Klopp regarding status and the upcoming HOA hearing on the alleged rental violations.	0.40	\$350.00	\$140.00
1/24/2022	JRR	Review and revise Motion for preliminary injunction and Complaint, correct the parties involved, and include facts and law regarding ARS 33-1806.01(D) and the HOA's ability to impose monetary penalties, and send the revised copies to M. Klopp.	0.50	\$250.00	\$125.00
1/25/2022	MAK	Monitor and exchange emails with client representatives and co-counsel regarding [REDACTED]	0.10	\$300.00	\$30.00
1/26/2022	MAK	Prepare for HOA meeting, review HOA bylaws and Declaration, review Arizona non-profit corporations act regarding notice requirements for hearings and/or meetings of Board; Multiple emails to W. Ehrlich, counsel for HOA, and J. Rathbun, Property Manager, regarding upcoming hearing, scope, and related issues; Attend HOA meeting concerning alleged rental restriction violations on Zoom; Status email to client representatives and co-counsel post-meeting.	1.60	\$300.00	\$480.00
1/26/2022	RKC	Monitor email communications between M. Klopp and co-counsel S. Banfield regarding the recent HOA Board meeting and concerning the entities represented and which received warning communications.	0.30	\$350.00	\$105.00
1/27/2022	JRR	Conference with M. Klopp regarding	0.30	\$250.00	\$75.00

HOA hearing, summons, and research drafting same.

1/31/2022	JRR	Conference with M. Klopp regarding Motion for Preliminary Injunction and Complaint necessary revisions with regard to excluding Cove HOA from suit.	0.20	\$250.00	\$50.00
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1/31/2022	MAK	Work on Complaint and Motion for Preliminary Injunction, remove Townhome HOA as defendant and update facts concerning recent violation hearing; Conference with Associate regarding remaining arguments for motion; Email updated drafts to R. Carter and S. Banfield for final review and filing/service upon defendant.	4.00	\$300.00	\$1,200.00
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Total Fees	\$15,755.00
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**Expenses**

<u>Start Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Charges</u>
1/06/2022	Quiet Title Statutory Fee	1.00	\$5.00

Total Expenses	\$5.00
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Total New Charges	\$15,760.00
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Previous Balance	\$14,500.00
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2/02/2022	Payment	Stockton D. Banfield, Esq.	\$-10,000.00
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Total Payments and Credits	\$-10,000.00
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Balance Due	\$20,260.00
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Wong & Carter, PC  
3003 N. Central Avenue, Suite 1000  
Phoenix, Arizona 85012

Rainbow Cove Homeowners  
3411 N. 5th Ave., Ste 300  
c/o Stockton D. Banfield, Esq./Dyer Bregman & Ferris,  
LLC  
Phoenix, AZ 85013

Date: 3/23/2022

Regarding: Rainbow Cove Homeowners/HOA  
Invoice No: 08053

Make checks payable to "Rick K. Carter, Attorney at Law"

**Services Rendered**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charges</u>
2/01/2022	JRR	Conference with M. Klopp regarding legal theories and methods for including Cove HOA as a defendant; Review file to locate and compile all necessary documents for utilization as exhibits for quiet title action and complaint for filing.	1.80	\$250.00	\$450.00
2/01/2022	MAK	Receive and review email from S. Banfield regarding revisions to pleadings; Conference with Associate regarding same; Revise pleadings consistent with comments.	0.80	\$300.00	\$240.00
2/01/2022	MAK	Finalize draft Complaint and Motion for Preliminary Injunction.	0.90	\$300.00	\$270.00
2/01/2022	RKC	Brief review of the most recent drafted of the Complaint and Motion for Preliminary Injunction; Teleconference with M. Klopp and co-counsel S. Banfield regarding same.	0.80	\$350.00	\$280.00
2/01/2022	RKC	Monitor email communications between M. Klopp and co-counsel S. Banfield regarding and forwarding the final drafts of the Complaint and Motion for Preliminary Injunction, brief review of same.	0.60	\$350.00	\$210.00

2/02/2022	JRR	Finish compiling exhibits for Motion and Complaint for filing.	0.20	\$250.00	\$50.00
2/03/2022	MAK	Continue revisions to draft pleadings based on client comments; Review Arizona Corporation Commission online database regarding ownership of entities for use in verifications; Revise client verifications to Complaint.	0.70	\$300.00	\$210.00
2/03/2022	RKC	Monitor multiple email communications between co-counsel S. Banfield and M. Klopp, as well as between S. Banfield and client group representative A. Bhola regarding [REDACTED] [REDACTED] Preparation of email communication to S. Banfield and M. Klopp suggesting revision language.	0.60	\$350.00	\$210.00
2/04/2022	MAK	Exchange and monitor numerous email communications with S. Banfield, R. Carter, A. Bhola, and R. Bryson regarding [REDACTED] [REDACTED]	0.20	\$300.00	\$60.00
2/04/2022	RKC	Exchange email communications with co-counsel S. Banfield and M. Klopp regarding the parties to be named in the pleadings and related items/issues.	0.40	\$350.00	\$140.00
2/07/2022	MAK	Exchange emails with S. Banfield regarding [REDACTED] [REDACTED]	0.10	\$300.00	\$30.00
2/07/2022	RKC	Preparation/receipt of multiple email communications with co-counsel S. Banfield, client representative A. Bhola, client R. Bryson, and M. Klopp regarding [REDACTED] [REDACTED]	0.40	\$350.00	\$140.00
2/08/2022	MAK	Teleconference with S. Banfield, R. Carter, A. Bhola, R. Bryson regarding [REDACTED] [REDACTED] Email to same [REDACTED] [REDACTED]	0.80	\$300.00	\$240.00

		regarding [REDACTED] [REDACTED]			
2/08/2022	RKC	Teleconference with various clients/client representatives, co-counsel S. Banfield and M. Klopp regarding [REDACTED] [REDACTED]	0.70	\$350.00	\$245.00
2/09/2022	MAK	Revise Complaint, Motion for Preliminary Injunction, and Verifications to reflect final parties to suit [REDACTED] [REDACTED]	0.60	\$300.00	\$180.00
2/09/2022	RKC	Receive and review email from client R. Bryson [REDACTED] Monitor multiple email communications between co-counsel S. Banfield, M. Klopp, and various clients regarding [REDACTED] [REDACTED] [REDACTED] Conference with M. Klopp regarding same.	0.40	\$350.00	\$140.00
2/10/2022	MAK	Email to W. Ehrlich and J. Rathbun regarding recording of Board meeting to conduct hearing on Bhola and McJunkin rental restriction violations.	0.10	\$300.00	\$30.00
2/10/2022	MAK	Exchange emails with S. Banfield regarding finalizing pleadings; Conference with R. Carter regarding same.	0.20	\$300.00	\$60.00
2/10/2022	RKC	Monitor email communications between co-counsel S. Banfield and M. Klopp, as well as various clients, regarding [REDACTED] [REDACTED] Preparation of email communication to S. Banfield regarding filing; Conference with M. Klopp regarding filing.	0.50	\$350.00	\$175.00
2/11/2022	JRR	Draft acceptance of service for W. Ehrlich and send the same to M. Klopp.	0.20	\$250.00	\$50.00
2/11/2022	MAK	Exchange emails with W. Ehrlich, counsel for HOA, regarding service and	0.50	\$300.00	\$150.00

		potential extension to file Answer; Conference with Associate regarding preparation of Acceptance of Service form for transmittal to W. Ehrlich; Exchange emails with S. Banfield regarding status of service efforts; Email Acceptance of Service form to W. Ehrlich.			
2/11/2022	RKC	Monitor email communications between M. Klopp, counsel for The Shores HOA. and co-counsel S. Banfield regarding service of the Summons, Complaint.	0.30	\$350.00	\$105.00
2/13/2022	MAK	Exchange email communications with R. Carter and S. Banfield service status and instructions.	0.10	\$300.00	\$30.00
2/13/2022	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield and M. Klopp regarding service of the Summons, Complaint and Motion for Preliminary Injunction.	0.20	\$350.00	\$70.00
2/14/2022	MAK	Receive Acceptance of Service from W. Ehrlich, counsel for Shores HOA; Forward same to S. Banfield and K. Spates; Receive notice of 2/16 Board of Directors Meeting for Shores HOA; Exchange emails with S. Banfield, R. Carter, and A. Bhola regarding same; Email to W. Ehrlich, Property Managers (Riepel and Rathbun), and S. Banfield regarding recording of prior Board meeting on alleged violations by Bhola and McJunkin and regarding purpose of upcoming 2/16 meeting.	0.40	\$300.00	\$120.00
2/14/2022	RKC	Receive and review email communication from M. Klopp forwarding the executed Acceptance of Service; Monitor email communications between co-counsel S. Banfield, M. Klopp and client group representative A. Bhola regarding the upcoming HOA Board meeting.	0.20	\$350.00	\$70.00
2/15/2022	MAK	Email to A. Bhola regarding 2/16 Board meeting.	0.10	\$300.00	\$30.00
2/15/2022	RKC	Monitor email communications between	0.10	\$350.00	\$35.00

client group representative A. Bhola and  
M. Klopp regarding [REDACTED]  
[REDACTED]

2/17/2022	MAK	Email from W. Ehrlich regarding voluntary stay of enforcement actions by Shores HOA pending litigation; Conference with R. Carter regarding same; Email to R. Carter and S. Banfield regarding same; Exchange and monitor emails between R. Carter, S. Banfield, A. Bhola, and J. Zehring; Monitor emails regarding [REDACTED] [REDACTED] Review Navajo County Recorder website regarding Kyer property description information; Prepare statutory quiet title demand letter for Kyer for service upon R. Whipple; Teleconference with R. Carter and S. Banfield regarding status of case and strategy in light of developments.	1.40	\$300.00	\$420.00
2/17/2022	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield regarding the decision of the HOA to suspend enforcement of the short-term rental ban; Conference with M. Klopp regarding same and concerning strategy going forward; Monitor email communications between M. Klopp and S. Banfield regarding same; Teleconference with S. Banfield and M. Klopp regarding same.	1.30	\$350.00	\$455.00
2/18/2022	MAK	Monitor emails between S. Banfield and W. Ehrlich regarding call to discuss stipulated preliminary injunction.	0.10	\$300.00	\$30.00
2/18/2022	RKC	Monitor email communications between co-counsel S. Banfield and HOA counsel W. Erlich regarding a possible discussion concerning a stipulated preliminary injunction and misc. related items/issues.	0.10	\$350.00	\$35.00
2/23/2022	MAK	Email to S. Banfield regarding status discussion with W. Ehrlich regarding stipulation to preliminary injunction; Conference with Associate regarding status of 20-day quiet title demand as to new homeowner and calendaring of	0.10	\$300.00	\$30.00

deadlines based on same.

Total Fees \$4,990.00

**Expenses**

<u>Start Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Charges</u>
2/10/2022	TurboCourt New Case Filing Fee	1.00	\$231.24

Total Expenses \$231.24

Total New Charges \$5,221.24

Previous Balance \$20,260.00

1/06/2022 Credit Quiet Title Statutory Fee Refund \$-5.00

2/28/2022 Payment \$-5,000.00

Total Payments and Credits \$-5,005.00

Balance Due \$20,476.24

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Wong & Carter, PC  
3003 N. Central Avenue, Suite 1000  
Phoenix, Arizona 85012

Rainbow Cove Homeowners  
3411 N. 5th Ave., Ste 300  
c/o Stockton D. Banfield, Esq./Dyer Bregman & Ferris,  
LLC  
Phoenix, AZ 85013

Date: 4/21/2022

Regarding: Rainbow Cove Homeowners/HOA  
Invoice No: 08102

Make checks payable to "Rick K. Carter, Attorney at Law"

**Services Rendered**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charges</u>
3/01/2022	MAK	Monitor emails among R. Carter, S. Banfield, and J. Csontos.	0.30	\$300.00	\$90.00
3/01/2022	RKC	Exchange multiple email communications to/from co-counsel S. Banfield and M. Klopp regarding status and strategy going forward.	0.40	\$350.00	\$140.00
3/02/2022	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield regarding scheduling of a teleconference to discuss status and strategy; Participate in teleconference with same regarding same; Receive and review copy of email communication from S. Banfield to defense counsel J. Csontos regarding a variety of concerning case management.	0.70	\$350.00	\$245.00
3/03/2022	MAK	Monitor emails between S. Banfield and J. Csontos; Exchange emails with S. Banfield regarding conference call with all counsel to discuss case.	0.10	\$300.00	\$30.00
3/07/2022	RKC	Preparation/receipt of email communications to/from K. Spate and HOA counsel J. Csontos regarding scheduling of a teleconference to	0.20	\$350.00	\$70.00

		discuss case management.			
3/08/2022	MAK	Monitor emails among all counsel regarding call with J. Csontos to discuss case status and potential preliminary stipulated order.	0.10	\$300.00	\$30.00
3/08/2022	RKC	Preparation/receipt of email communications to/from K. Spate and HOA counsel J. Csontos regarding scheduling of a teleconference to discuss case management.	0.20	\$350.00	\$70.00
3/09/2022	MAK	Teleconference with R. Carter, S. Banfield, and J. Csontos regarding case status and strategy for addressing preliminary stipulated orders.	0.40	\$300.00	\$120.00
3/09/2022	RKC	Teleconference with defense counsel J. Csontos as well as with co-counsel S. Banfield and M. Klopp regarding pre-trial/preliminary matters and case management issues; Monitor email communications between S. Banfield and client group representative A. Bhola concerning [REDACTED]	0.50	\$350.00	\$175.00
3/14/2022	MAK	Email to R. Carter and S. Banfield regarding status of amendment to pleading to add Kyer as plaintiff.	0.10	\$300.00	\$30.00
3/16/2022	RKC	Preparation/receipt of email communications to/from K. Spates and co-counsel S. Banfield regarding scheduling of a teleconference to discuss case management.	0.10	\$350.00	\$35.00
3/17/2022	MAK	Teleconference with S. Banfield and R. Carter regarding case status and strategy; Receive and review draft First Amended Complaint to add Kyer; Email to S. Banfield regarding same.	0.40	\$300.00	\$120.00
3/17/2022	RKC	Teleconference with co-counsel S. Banfield regarding status and strategy.	0.30	\$350.00	\$105.00
3/21/2022	MAK	Review Supreme Court website regarding status of Kalway; Email to R. Carter and S. Banfield regarding status and forthcoming Opinion.	0.10	\$300.00	\$30.00

3/22/2022	MAK	Locate Kalway opinion from Arizona Supreme Court website; Preliminary review and analysis of same; Email copy to S. Banfield for review; Conference with R. Carter regarding same and strategy.	0.30	\$300.00	\$90.00
3/22/2022	RKC	Conference with M. Klopp regarding the relevance and substance of the recent Arizona Supreme Court Decision in Kalway v. Calabria; Brief review of same.	1.00	\$350.00	\$350.00
3/23/2022	MAK	Review Kalway and First Amendment recorded by HOA to evaluate application of opinion; Prepare draft blue-pencil version of First Amendment; Conference with R. Carter regarding same and Kalway; Exchange numerous emails with S. Banfield regarding same.	1.70	\$300.00	\$510.00
3/23/2022	RKC	Multiple conferences with M. Klopp regarding the interpretation and application of the Kalway Decision to the clients' pending matter.	0.80	\$350.00	\$280.00
3/24/2022	JRR	Conference with M. Klopp regarding stipulated preliminary injunction order and Kalway Supreme Court decision and locate clean copy of First Amendment and provide the same to M. Klopp for blue penciling.	0.30	\$250.00	\$75.00
3/24/2022	MAK	Conference with Associate regarding drafting of stipulated order for preliminary hearing in Navajo County; Prepare letter to J. Csontos, counsel for HOA, with 33-420 demand to correct/release First Amendment; Prepare final form of blue-penciled Amendment for consideration by clients; Review ARS 33-420 in preparing letter; Email draft letter and blue-penciled Amendment to R. Carter and S. Banfield for comment.	2.40	\$300.00	\$720.00
3/24/2022	RKC	Review draft correspondence to counsel for the HOA prepared by M. Klopp addressing the recent decision in Kalway and proposing a resolution to	0.20	\$350.00	\$70.00

the ongoing dispute.

3/25/2022	MAK	Emails with S. Banfield and A. Bhola regarding [REDACTED]	0.20	\$300.00	\$60.00
3/25/2022	RKC	Preparation of email communication to M. Klopp and co-counsel S. Banfield regarding the draft correspondence to attorney J. Csontos; Monitor email communications between same and client group representative A. Bhola regarding [REDACTED]	0.40	\$350.00	\$140.00
3/28/2022	MAK	Emails with A. Bhola regarding [REDACTED] Final review and revisions to 33-420 demand letter; Transmit letter to J. Csontos, R. Carter, and S. Banfield; Exchange emails regarding Response to Motion to Preliminary Injunction filed by HOA.	0.40	\$300.00	\$120.00
3/28/2022	RKC	Receive and review email communication from the office of defense counsel J. Csontos forwarding the HOA's Response to the Motion for Preliminary Injunction; Brief review of same; Exchange email communications and conference with M. Klopp regarding same.	0.70	\$350.00	\$245.00
3/29/2022	JRR	Conference with M. Klopp regarding Preliminary Injunction Response and Answer from HOA.	0.90	\$250.00	\$225.00
3/29/2022	MAK	Review and evaluate Response to Preliminary Injunction Motion filed by HOA; Conference with Associate regarding strategy for arguments in Reply and structure of same; Email to J. Csontos to confirm filing date.	1.00	\$300.00	\$300.00
3/29/2022	RKC	Monitor email communications between M. Klopp and HOA counsel J. Csontos and his staff regarding the filing of the Response to the Motion for Preliminary Injunction and supporting Exhibits; Conference with M. Klopp regarding preparation of the Reply to the HOA's Response.	0.30	\$350.00	\$105.00

3/30/2022	JRR	Review Answer to Complaint and Response to Preliminary Injunction Motion; Conference with M. Klopp regarding HOA responses and structure for official reply.	1.20	\$250.00	\$300.00
				Total Fees	<u>\$4,880.00</u>
		Total New Charges			<u>\$4,880.00</u>
		Previous Balance			\$20,476.24
3/30/2022	Payment				<u>\$-13,125.00</u>
		Total Payments and Credits			<u>\$-13,125.00</u>
		Balance Due			<u><u>\$12,231.24</u></u>

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Wong & Carter, PC  
3003 N. Central Avenue, Suite 1000  
Phoenix, Arizona 85012

Rainbow Cove Homeowners  
3411 N. 5th Ave., Ste 300  
c/o Stockton D. Banfield, Esq./Dyer Bregman & Ferris,  
LLC  
Phoenix, AZ 85013

Date: 5/19/2022

Regarding: Rainbow Cove Homeowners/HOA  
Invoice No: 08156

Make checks payable to "Rick K. Carter, Attorney at Law"

**Services Rendered**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charges</u>
4/04/2022	MAK	Exchange emails with client representatives, A. Bhola and J. Zehring, and with S. Banfield, regarding [REDACTED] [REDACTED] Conference with Associate regarding same and expected purpose and protocol for telephonic hearing; Conference with Associate regarding Reply to Motion for Preliminary Injunction in event necessary to file.	0.60	\$300.00	\$180.00
4/04/2022	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield and M. Klopp regarding status and strategy going forward.	0.50	\$350.00	\$175.00
4/04/2022	JRR	Conference with M. Klopp regarding hearing on Preliminary Injunction Motion, call judicial assistant and discuss the same; Conference with M. Klopp regarding discussion with judicial assistant concerning the scheduled hearing; Begin drafting reply to HOA's Response to Motion for Preliminary Injunction.	2.90	\$250.00	\$725.00
4/05/2022	JRR	Finish drafting Reply; Conference with	3.70	\$250.00	\$925.00

M. Klopp regarding necessary revisions to Reply.

4/05/2022	MAK	Teleconference with S. Banfield regarding upcoming hearing in Navajo County Superior Court and case strategy generally; Receive and review draft Reply to Motion for Preliminary Injunction; Conference with Associate regarding revisions to same and strategy for arguments and procedure for moving case forward.	1.30	\$300.00	\$390.00
4/06/2022	JRR	Revise Reply to HOA's Response to Motion pursuant to conference with M. Klopp; Conference with M. Klopp regarding hearing and necessary stipulated order and forthcoming summary judgment motion.	1.10	\$250.00	\$275.00
4/06/2022	MAK	Review file, including all previously filed briefing, and outline issues to raise in preparation for telephonic hearing before Navajo County Superior Court on Motion for Preliminary Injunction; Participate in telephonic hearing before Judge Ruechel of Navajo County Superior Court; Conference with Associate regarding preparation of Stipulation and Order as discussed during hearing; Email to S. Banfield and client representative, A. Bhola [REDACTED] [REDACTED]	1.60	\$300.00	\$480.00
4/07/2022	JRR	Draft Stipulation for Entry of Preliminary Orders and Form of Order; Conference with M. Klopp regarding necessary revisions to the same, revise and transmit revised copies to S. Banfield, M. Klopp, and R. Carter.	2.20	\$250.00	\$550.00
4/08/2022	MAK	Conference with R. Carter regarding the outcome of the recent Status Conference; Exchange email communications with R. Carter and co-counsel S. Banfield regarding same as well as concerning status and strategy going forward.	0.70	\$300.00	\$210.00
4/08/2022	RKC	Conference with M. Klopp regarding the	0.70	\$350.00	\$245.00

outcome of the recent Status Conference; Exchange email communications with M. Klopp and co-counsel S. Banfield regarding same as well as concerning status and strategy going forward.

4/11/2022	MAK	Email to litigation team regarding strategy for dispositive motion practice; Review Answer filed by HOA for admissions to use in dispositive motion; Conference with R. Carter regarding status and strategy; Teleconference with J. Csontos, counsel for HOA, regarding agreement to forego filing of Reply to Motion for Preliminary Injunction put on record and to be memorialized by stipulation and proposed order on scheduling; Prepare confirming email to J. Csontos regarding same.	1.00	\$300.00	\$300.00
4/11/2022	RKC	Exchange multiple email communications to/from S. Banfield and M. Klopp regarding status and strategy, most notably the early filing of a Motion for Summary Judgment; Conference with M. Klopp regarding same.	0.90	\$350.00	\$315.00
4/12/2022	JRR	Receive and review email correspondence between R. Carter, M. Klopp, and S. Banfield regarding legal/litigation strategy and Motion for Summary Judgment; Conference with M. Klopp regarding Motion for Summary Judgment and begin drafting the same.	2.50	\$250.00	\$625.00
4/12/2022	MAK	Conference with Associate regarding strategy and arguments for Motion for Summary Judgment and argument to respond to qualified admission in Answer regarding entity ownership.	0.20	\$300.00	\$60.00
4/12/2022	RKC	Receive and review email communication from co-counsel S. Banfield regarding preparation of the client's Motion for Summary Judgment.	0.10	\$350.00	\$35.00
4/13/2022	JRR	Continue drafting Motion for Summary Judgment.	4.80	\$250.00	\$1,200.00

4/14/2022	JRR	Finish drafting Motion for Summary Judgment.	2.60	\$250.00	\$650.00
4/19/2022	JRR	Conference with M. Klopp regarding Motion for Summary Judgment revisions; Revise Motion for Summary Judgment pursuant to discussions with M. Klopp and transmit revised Motion for Summary Judgment to R. Carter.	2.10	\$250.00	\$525.00
4/19/2022	MAK	Email to J. Csontos regarding stipulated order status and related procedural issues; Receive and review draft Motion for Summary Judgment and conference with Associate regarding ongoing revisions to same.	0.60	\$300.00	\$180.00
4/19/2022	RKC	Brief review of the first draft of the Motion for Summary Judgment; Preparation of email communication to co-counsel S. Banfield forwarding same for review.	0.60	\$350.00	\$210.00
4/20/2022	MAK	Receive and review stipulation and order redlines from J. Constos, counsel for HOA; Exchange emails with R. Carter and S. Banfield regarding same; Conference with Associate regarding Motion for Summary Judgment status and strategy for arguments; Email to J. Csontos regarding stipulation; Monitor and respond to emails from S. Banfield and client representative, A. Bhola, regarding ██████████ █████████ Conference with R. Carter regarding Motion for Summary Judgment strategy; Respond to S. Banfield regarding Motion for Summary Judgment.	1.30	\$300.00	\$390.00
4/20/2022	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield as well as M. Klopp regarding the draft Stipulation and Order and related email communication from attorney J. Csontos, also concerning strategy relative to the filing of an early Motion for Summary Judgment; Review the Stipulation. Order and email communication from J. Csontos; Conference with M. Klopp regarding	0.80	\$350.00	\$280.00

same as well as concerning strategy going forward; Monitor email communications between S. Banfield and M. Klopp regarding same.

4/21/2022	MAK	Exchange emails with D. Walt, Pioneer Title, regarding Navajo County Recorder instruments to evaluate for legitimacy of original CC&Rs.	0.10	\$300.00	\$30.00
4/22/2022	MAK	Conference with R. Carter regarding Motion for Summary Judgment strategy and status.	0.30	\$300.00	\$90.00
4/25/2022	JRR	Conference with M. Klopp regarding Motion for Summary Judgment revisions, notes from S. Banfield; Revise statement of facts in support of Motion for summary judgment pursuant to conference with M. Klopp.	1.20	\$250.00	\$300.00
4/25/2022	MAK	Revise, work on, and finalize Motion for Summary Judgment and Statement of Facts regarding validity of Amendment for e-filing; Email same to S. Banfield, R. Carter, J. Csontos, and J. Cunningham; Exchange emails with A. Bhola and S. Banfield regarding [REDACTED] [REDACTED] Teleconference with S. Banfield regarding same and Motion for Summary Judgment filing.	2.40	\$300.00	\$720.00
4/25/2022	RKC	Review the final version of the clients' Motion for Summary Judgment and supporting documentation.	0.50	\$350.00	\$175.00
4/26/2022	MAK	Respond to A. Bhola regarding [REDACTED] [REDACTED]	0.10	\$300.00	\$30.00

Total Fees \$10,270.00

Total New Charges \$10,270.00

Previous Balance \$12,231.24

Balance Due \$22,501.24

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Wong & Carter, PC  
3003 N. Central Avenue, Suite 1000  
Phoenix, Arizona 85012

Rainbow Cove Homeowners  
3411 N. 5th Ave., Ste 300  
c/o Stockton D. Banfield, Esq./Dyer Bregman & Ferris,  
LLC  
Phoenix, AZ 85013

Date: 6/24/2022

Regarding: Rainbow Cove Homeowners/HOA  
Invoice No: 08200

Make checks payable to "Rick K. Carter, Attorney at Law"

**Services Rendered**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charges</u>
5/05/2022	MAK	Receive and review Order entered by Court.	0.10	\$300.00	\$30.00
5/14/2022	MAK	Receive email from A. Bhola regarding [REDACTED] [REDACTED] Email to R. Carter and S. Banfield regarding same and confirming outside scope of engagement.	0.10	\$300.00	\$30.00
5/16/2022	MAK	Email to A. Bhola [REDACTED] [REDACTED] Conference with R. Carter regarding same.	0.10	\$300.00	\$30.00
5/31/2022	RKC	Receive and review email communication from the office of attorney J. Csontos regarding and forwarding the Defendant's Response to Motion for Summary Judgment and Cross-motion for Summary Judgement; Brief review of same; Conference with M. Klopp regarding same and related items/issues.	0.50	\$350.00	\$175.00

Total Fees \$265.00

Total New Charges	\$265.00
Previous Balance	\$22,501.24
5/17/2022 Payment	\$-5,750.00
6/24/2022 Payment	\$-16,751.24
Total Payments and Credits	<u>\$-22,501.24</u>
Balance Due	<u><u>\$265.00</u></u>

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Wong & Carter, PC  
3003 N. Central Avenue, Suite 1000  
Phoenix, Arizona 85012

Rainbow Cove Homeowners  
3411 N. 5th Ave., Ste 300  
c/o Stockton D. Banfield, Esq./Dyer Bregman & Ferris,  
LLC  
Phoenix, AZ 85013

Date: 7/18/2022

Regarding: Rainbow Cove Homeowners/HOA  
Invoice No: 08232

Make checks payable to "Rick K. Carter, Attorney at Law"

**Services Rendered**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Charges</u>
6/02/2022	MAK	Receive and review Order regarding hearing of motions for summary judgment; Email to S. Banfield and R. Carter regarding account status.	0.10	\$300.00	\$30.00
6/05/2022	RKC	Receive and review email communication from co-counsel S. Banfield regarding status and strategy going forward.	0.10	\$350.00	\$35.00
6/06/2022	JRR	Conference with M. Klopp regarding HOA Motion for Summary Judgment and Response; Review and analyze Response to Motion for Summary Judgment.	1.30	\$250.00	\$325.00
6/06/2022	MAK	Conference with Associate regarding preliminary strategy for drafting Reply to Motion for Summary Judgment and Response to Cross Motion for Summary Judgment; Conference with R. Carter regarding same.	0.80	\$300.00	\$240.00
6/07/2022	JRR	Draft motion to withdraw and proposed order for M. Klopp; Receive and monitor various emails between M. Klopp and J. Csontos regarding combined filing, draft notice of the same, and transmit draft to	1.90	\$250.00	\$475.00

S. Banfield for review/filing.

6/07/2022	MAK	Exchange emails with co-counsel, S. Banfield and R. Carter, and with client representatives regarding [REDACTED] Email to J. Csontos for agreed deadline on reply/response to Motion for Summary Judgment and Cross Motion for Summary Judgment briefing; Conference with Associate regarding notice of extension and review draft same.	0.80	\$300.00	\$240.00
6/07/2022	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield regarding a possible agreement with opposing counsel to combine the clients' Reply/Response concerning the competing Motions for Summary Judgment.	0.20	\$350.00	\$70.00
6/08/2022	MAK	Conference with Associate regarding filing of notice extension to file reply/response with the Navajo County Superior Court.	0.10	\$300.00	\$30.00
6/09/2022	JRR	Review and analyze legal issues raised by HOA Response and Counterclaim and how to respond to the same.	0.20	\$250.00	\$50.00
6/13/2022	MAK	Conference with Associate regarding strategy for Response/Reply Motion for Summary Judgment and Cross Motion for Summary Judgment.	0.10	\$300.00	\$30.00
6/16/2022	RKC	Receive and review email communication from client group representative A. Bhola regarding [REDACTED] [REDACTED] [REDACTED] review same.	0.10	\$350.00	\$35.00
6/17/2022	RKC	Monitor email communications between co-counsel S. Banfield and M. Klopp regarding [REDACTED] [REDACTED]	0.10	\$350.00	\$35.00
6/21/2022	RKC	Teleconference with co-counsel S. Banfield regarding the significance of	0.30	\$350.00	\$105.00



6/27/2022	JRR	Begin drafting Rainbow Cove Combined Reply/Response; Conference with M. Klopp regarding drafting strategy and key issues for Reply/Response.	1.90	\$250.00	\$475.00
6/27/2022	MAK	Conference with Associate regarding the Reply/Response Motion for Summary Judgment and Cross Motion for Summary Judgment.	0.70	\$300.00	\$210.00
6/28/2022	JRR	Continue drafting combined Reply/Response, including multiple conferences with M. Klopp and R. Carter regarding Kalway case law, Defendant's Response and Cross-motion arguments, and draft strategy for Reply/Response.	3.60	\$250.00	\$900.00
6/28/2022	MAK	Multiple conferences with Associate regarding Reply/Response arguments.	1.10	\$300.00	\$330.00
6/29/2022	JRR	Finish drafting combined Reply/Response, including discussion of appropriate standards for court to consider in determining whether to deny or grant Motion for Summary Judgment, discussion of Arizona case law including Kalway and Dreamland, rebutting arguments of HOA's response/counter-motion, and reaffirm demand for summary judgment; transmit draft to M. Klopp for review	5.60	\$250.00	\$1,400.00
6/29/2022	MAK	Conference with Associate regarding additional arguments for Reply/Response.	0.60	\$300.00	\$180.00
6/30/2022	JRR	Conference with M. Klopp regarding revisions to combined Reply/Response; Revise combined Reply/Response consistent with comments from M. Klopp and transmit draft to R. Carter, M. Klopp, and S. Banfield; Conference with R. Carter and M. Klopp regarding revisions to Reply/Response and revise Reply/Response consistent with	2.30	\$250.00	\$575.00

comments from R. Carter and re-circulate revised draft to S. Banfield for review.

6/30/2022	MAK	Receive and review draft Reply/Response; Conference with Associate regarding revisions; Conference with R. Carter and Associate.	1.60	\$300.00	\$480.00
6/30/2022	RKC	Review the draft combined Reply/Response in support of the clients' Motion for Summary Judgment; Conference with M. Klopp and J. Rainey regarding same; Monitor email communications between J. Rainey and co-counsel S. Banfield regarding the draft of same.	0.90	\$350.00	\$315.00

Total Fees \$6,565.00

Total New Charges

\$6,565.00

Previous Balance

\$265.00

Balance Due

\$6,830.00

Wong & Carter, PC  
3003 N. Central Avenue, Suite 1000  
Phoenix, Arizona 85012

Date: 8/17/2022

Rainbow Cove Homeowners  
3411 N. 5th Ave., Ste 300  
c/o Stockton D. Banfield, Esq./Dyer Bregman & Ferris,  
LLC  
Phoenix, AZ 85013

Regarding: Rainbow Cove Homeowners/HOA  
Invoice No: 08298

Make checks payable to "Rick K. Carter, Attorney at Law"

**Services Rendered**

Date	Staff	Description	Hours	Rate	Charges
7/01/2022	RKC	Monitor email communications between the Navajo County Superior Court and attorney J. Csontos regarding the schedule for the oral argument on the competing Motions for Summary Judgment.	0.20	\$350.00	\$70.00
7/03/2022	RKC	Receive and review email communication from co-counsel S. Banfield regarding the draft combined Reply/Response in support of the client's Motion for Summary Judgment.	0.10	\$350.00	\$35.00
7/05/2022	JRR	Receive and review emails from S. Banfield regarding revisions to combined Reply/Response; Review redlined version from S. Banfield;	4.60	\$250.00	\$1,150.00

<p>Conference with M. Klopp regarding S. Banfield revisions; Revise combined Reply/Response consistent with comments from S. Banfield and M. Klopp and circulate revised versions to S. Banfield, M. Klopp, and R. Carter for further review; Conference with M. Klopp regarding further necessary revisions and comments for Reply/Response and revise the same consistent with said discussion; Prepare response to separate statement of facts, conference with M. Klopp regarding revisions, revise the same, and finalize version for filing; Exchange and monitor emails from S. Banfield and M. Klopp regarding final review of filings and procedural matters regarding filing, compile and finalize Reply/Response and response to separate statement of facts and send finalized versions to assistant for filing.</p>		<p>7/05/2022</p>	<p>MAK</p>	<p>1.40</p>	<p>\$300.00</p>	<p>\$420.00</p>
<p>Receive and review email from S. Banfield with comments to draft Reply/Response to Motion for Summary Judgment and Cross Motion for Summary Judgment; Multiple conferences with Associate regarding same and further revisions; Review Declaration regarding Tract Declaration arguments.</p>		<p>7/05/2022</p>	<p>RKC</p>	<p>0.90</p>	<p>\$350.00</p>	<p>\$315.00</p>
<p>Receive and review multiple email communications from J. Rainey regarding and forwarding multiple revised drafts of the combined Response/Reply in support of the clients' Motion for Summary Judgment; Review the forwarded drafts; Conferences with M. Klopp and J. Rainey regarding same.</p>		<p>7/08/2022</p>	<p>JRR</p>	<p>0.40</p>	<p>\$250.00</p>	<p>\$100.00</p>
<p>Conference with M. Klopp and R. Carter regarding new Court of Appeals decision applying Kalway case and potential ramifications for recently filed Reply/Response, including monitoring of emails between M. Klopp and S. Banfield</p>		<p>7/08/2022</p>	<p>MAK</p>	<p>0.30</p>	<p>\$300.00</p>	<p>\$90.00</p>

7/08/2022	RKC	Decision under Kalway jurisprudence to evaluate for use in upcoming argument; Conference with Associate regarding same; Email copy of case to S. Banfield.	0.60	\$350.00	\$210.00
7/11/2022	RKC	Preparation/receipt of email communications to/from co-counsel S. Banfield regarding the upcoming oral argument and the possible attendance of the clients; Monitor email communications between same and M. Klopp regarding the new Appellate Decision; Brief conference with M. Klopp regarding same.	0.50	\$350.00	\$175.00
7/12/2022	JRR	Review and analyze recently issued Jie Cao v. PFP Dorsey Investment case from Court of Appeals regarding Kalway and conference with M. Klopp regarding utility for present dispute and whether supplemental briefing regarding the same is necessary	0.70	\$250.00	\$175.00
7/12/2022	MAK	Conference with R. Carter regarding argument on Motion for Summary Judgment; Email to S. Banfield regarding same and lodging.	0.20	\$300.00	\$60.00
7/12/2022	RKC	Multiple conferences with M. Klopp regarding the upcoming oral argument.	0.60	\$350.00	\$210.00
7/13/2022	JRR	Conduct preliminary review of HOA Reply to Combined Response/Reply and conference with M. Klopp regarding the same and forthcoming hearing preparation necessities	0.90	\$250.00	\$225.00
7/13/2022	MAK	Email from S. Banfield regarding argument and stipulation to amend Complaint; Conference with R. Carter and Associate regarding first amended Complaint status and strategy; Telephone call to J. Csontos regarding same and stipulation to file same; Email to J. Csontos regarding same; Research lodging and prepare formal	1.30	\$300.00	\$390.00

budget proposal for client review for argument travel and associated costs; Telephone call to Wigwam Hotel to reserve accommodations; Email to Wigwam for same; Preliminary review of Reply to Cross Motion for Summary Judgment.			1.40	\$350.00	\$490.00
Multiple conferences with M. Klopp regarding the upcoming oral argument on the competing motions for summary judgment as well as the amendment of the Complaint to include an additional party; Preparation/receipt of email communications to/from co-counsel S. Banfield regarding same; Receive and review email communication from the office of defense counsel, J. Csontos, forwarding the Reply in support of Defendant's Motion for Summary Judgment, brief review of same.	RKC	7/13/2022	1.70	\$250.00	\$425.00
Receive, monitor, and review various emails from M. Klopp and R. Carter regarding hearing location, review Navajo County court information to ascertain correct courthouse information, and conference with M. Klopp regarding the same; Prepare materials for hearing, including Reply breakdown and various conferences with M. Klopp regarding the same.	JRR	7/14/2022	4.00	\$300.00	\$1,200.00
Exchange numerous emails with S. Banfield, R. Carter, and K. Spates regarding stipulation to amend Complaint and related issues); Conference with Associate regarding arguments in Reply to Motion for Summary Judgment and assembly of materials for argument; Numerous emails with S. Banfield and K. Spates regarding amended pleading; Emails with A. Bhola regarding [REDACTED] Revise proposed amended pleading; Conference with R. Carter regarding strategy.	MAK	7/14/2022	1.40	\$350.00	\$490.00
Multiple conferences with M. Klopp regarding the upcoming hearing on the competing motions for summary	RKC	7/14/2022			

7/15/2022	JRR	<p>judgment and the filing of the Amended Complaint adding parties; Monitor email communications between co-counsel S. Banfield, Legal Assistant K. Spate, client group representative A. Bholia and M. Klopp regarding [REDACTED]</p> <p>Review and prepare materials for hearing, including beginning to draft Reply memorandum for utilization by M. Klopp in hearing, conducting legal research and compiling relevant case law for hearing, prepare file of pleadings for use in hearing, and all other materials requested by M. Klopp; multiple conferences with M. Klopp regarding hearing issues to be addressed, including variety of arguments presented by HOA in Reply; Finish drafting Reply memorandum; Conduct final review of assembled hearing materials and file, and finalize all documents.</p>	3.40	\$250.00	\$850.00
7/15/2022	MAK	<p>Email to J. Csontos regarding stipulation for amendment; Finalize First Amended Complaint for filing; Prepare Notice of Filing First Amended Complaint; Assemble exhibits to same.</p>	1.20	\$300.00	\$360.00
7/15/2022	RKC	<p>Multiple conferences with M. Klopp regarding the upcoming oral argument on the competing motions for summary judgment.</p>	0.60	\$350.00	\$210.00
7/17/2022	MAK	<p>Travel to Holbrook in advance of attending oral argument on Motion for Summary Judgment and Cross Motion for Summary Judgment.</p>	3.50	\$300.00	\$1,050.00
7/18/2022	JRR	<p>Receive, review, and respond to various emails from M. Klopp regarding July 18 hearing, including preparation of memorandum emails regarding A.R.S. 33-1806.01 and Nicdon case law for utilization and applicability to hearing</p>	0.70	\$250.00	\$175.00
7/18/2022	MAK	<p>Prepare for oral argument on Motion for Summary Judgment and Cross Motion for Summary Judgment; Attend and participate in oral argument before</p>	7.90	\$300.00	\$2,370.00



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Wong & Carter, PC  
3003 N. Central Avenue, Suite 1000  
Phoenix, Arizona 85012

Rainbow Cove Homeowners  
3411 N. 5th Ave., Ste 300  
c/o Stockton D. Banfield, Esq./Dyer Bregman & Ferris,  
LLC  
Phoenix, AZ 85013

Date: 9/14/2022

Regarding: Rainbow Cove Homeowners/HOA  
Invoice No: 08359

Make checks payable to "Rick K. Carter, Attorney at Law"

Previous Balance \$11,588.00

Balance Due \$11,588.00

# EXHIBIT D

**DYER BREGMAN & FERRIS, PLLC**  
**Attorneys at Law**  
**3411 North 5th Avenue, Suite 300**  
**Phoenix, Arizona 85013**  
**(602) 254-6008**

Amy Sue Bhola  
5200 East Camino Apolena  
Tucson AZ 85718

Page: 1  
08/31/2021  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 1

Amy Bhola et. al v. Shores HOA

			RATE	HOURS	
07/30/2021	SDB	Prepare for and participate in conference call (1..5); research re argument for invalidating short-term rental clause (1.1).		2.60	no charge
08/01/2021	SDB	Reviewed client email and sent response proposing strategy for moving forward.	325.00	0.50	162.50
08/10/2021	SDB	Reviewed client email, reviewed Nicodon 10663, LLC v. DMMA, notes to file re same, responded to client email.	325.00	0.60	195.00
08/12/2021	SDB	Reviewed A. Callie email, pulled CC&R's responded to same with interpretation of the covenants.	325.00	0.80	260.00
08/13/2021	AMT	Made client contact for Amy Sue Bhola re Shores HOA matter.		0.20	no charge
08/17/2021	AMT	Created contact file for Albert Callie. Printed and saved documents to efile.	75.00	0.27	20.25
	SDB	Email to D. Degnan, email to M. Horne, email to L. Krupknick re questions with short term rental litigation.	325.00	0.40	130.00
	AMT	New client file set up.	75.00	0.50	37.50
	SDB	Receipt and review [REDACTED] Credit Card Payment dated August 17, 2021, in the amount of \$2,500.00, from Albert A. Callie.		0.20	no charge
08/18/2021	SKS	Review of e-mail correspondence from Mark Horne's office regarding setting up telephone conference and respond.	175.00	0.20	35.00
	SDB	Reviewed documents in clients dropbox folder and made notes for letter.	325.00	1.70	552.50
08/19/2021	SDB	Call with M. Horne re results of HOA injunction hearing and law relied on for his case.	325.00	0.60	195.00
	SDB	Reviewed Bylaws, CC&R's, pleadings and law from Mountain Gate Property Owner Association, Inc., litigation, pulled relevant statutes, drafted email to clients with Mountain Gate Property Owner Association, Inc., pleadings for review, notes to file re same.	325.00	3.00	975.00
	SDB	Pulled research re voting regulations and written consent; reviewed the same and made notes.	325.00	1.60	520.00
08/20/2021	SDB	Reviewed A. Callie email, reviewed article, responded to same with comments.	325.00	0.30	97.50
08/23/2021	SKS	Review of various e-mails to/from all regarding setting up teleconference. Schedule teleconference using conference bridge			

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

Page: 2  
08/31/2021  
ACCOUNT NO: 2021335-00A  
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			RATE	HOURS	
		and send e-mail to all parties regarding same.	175.00	0.40	70.00
	SDB	Began drafting letter to Erlich.	325.00	0.40	130.00
08/24/2021	SDB	Prepared for and participated in call with A. Callie and B. Jones, reviewed A. Callie email and responded to same regarding Cove CC&R's.	325.00	1.80	585.00
08/25/2021	SDB	Reviewed B. Jones email, pulled short term rental statute, responded to email answering A. Bhola questions and made notes to file.	325.00	0.30	97.50
08/26/2021	SDB	Completed first draft of Ehrlich letter.	325.00	1.10	357.50
08/27/2021	SDB	Reviewed Cove CC&R's and <i>Wilson v. Playa de Serrano</i> , and <i>Sunburst Farms E., Inc. v. Braden</i> , and compared to Shore CC&R, and Consent forms (1.6); revised letter to Ehrlich adding consent form violations, language from Wilson and Sunburst, and updating case law (1.5); drafted email to clients with proposed resolution section for advice (0.2).	325.00	3.30	1,072.50
08/30/2021	SDB	Reviewed and revised letter, added Restatement Section 6.3, updated explanation on Wilson case, and updated proposals for resolution.	325.00	1.70	552.50
	SDB	Draft email to clients with draft of letter to Ehrlich.	325.00	0.10	32.50
	SDB	Reviewed B. Jones email and responded to same re sending letter to community and proposed changes.	325.00	0.20	65.00
		FOR CURRENT SERVICES RENDERED		19.77	6,142.75
		Current Non-Billable Hours		3.00	

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	18.40	\$325.00	\$5,980.00
Ashely M. Tobin	0.77	75.00	57.75
Sharon Kay Spates	0.60	175.00	105.00

TOTAL CURRENT WORK 6,142.75

**PLEASE REMIT THIS BALANCE** \$6,142.75

Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$0.00
08/18/2021	Advance CC funds received from Albert A. Callie. Thank you.	<u>2,500.00</u>
	<b>Remaining Trust Balance</b>	<u>\$2,500.00</u>

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

Page: 3  
08/31/2021  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 1

PAYMENT DUE UPON RECEIPT.  
ONLINE CREDIT CARDS AND eCHECKS ACCEPTED. CLICK ON COVER  
PAGE LINK.  
**Payment received after statement date is reflected on next month's billing**  
T.I.N. 81-0946829

**DYER BREGMAN & FERRIS, PLLC**  
**Attorneys at Law**  
**3411 North 5th Avenue, Suite 300**  
**Phoenix, Arizona 85013**  
**(602) 254-6008**

Amy Sue Bhola  
5200 East Camino Apolena  
Tucson AZ 85718

Page: 1  
09/30/2021  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 3

Amy Bhola et. al v. Shores HOA

				PREVIOUS BALANCE	\$6,142.75
				RATE	HOURS
09/01/2021	SDB	Meet and confer with M. Bregman re Restatement 2nd of Trust and trustee signature required; notes to file re same.	325.00	0.20	65.00
09/03/2021	SDB	Reviewed A. Bhola email and drafted response email that included questions generated from A. Bhola email and detailed next steps and included client invoice; reviewed documents provided by client and incorporated questions into response.	325.00	1.60	520.00
	SDB	Reviewed emails from A. Bhola re changes to letter and rental issue explanation.	325.00	0.30	97.50
09/10/2021	SDB	Reviewed A. Callie email with edits and responded to same.	325.00	0.10	32.50
09/14/2021	SDB	Reviewed email from A. Bhola, responded to same, reviewed letter, sent email to K. Spates with Exhibit A and edits to incorporate it.	325.00	0.30	97.50
09/15/2021	SKS	Implement revisions to Ehrlich letter, attach exhibit and forward for approval.	175.00	0.30	52.50
09/16/2021	SKS	Finalize correspondence to Wendy Ehrlich, preparation of e-mail correspondence to Ehrlich with letter and bcc to clients and perfect mailing of hard copy.	175.00	0.30	52.50
09/21/2021	SDB	Reviewed A. Bhola email and email from Rick Bryson, reviewed class rule, drafted email to A. Bhola regarding privilege, 2022 short-term rentals, and next steps.	325.00	0.60	195.00
	SDB	Reviewed Order re Mountain Gate HOA litigation, compared language to Shores and Cove CC&R's, drafted email to clients with Order and best argument to make based on this Order.	325.00	1.10	357.50
	SDB	Reviewed email from B. Jones re email to other homeowners, made suggestions for revisions based on language in First Amendment, responded to B. Jones email with suggestions.	325.00	0.50	162.50
09/22/2021	SDB	Reviewed B. Jones email, made edits, and responded to same.	325.00	0.60	195.00
	SDB	Reviewed revised email from B. Jones and responded to same agreeing with email.	325.00	0.20	65.00
09/23/2021	SDB	Email exchange with L. Krupnik re meeting and HOA questions.	325.00	0.10	32.50
09/24/2021	SDB	Call with A. Callie re next steps in litigation, billing and			

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

			RATE	HOURS	
		supplemental letter to Ehrlich.	325.00	0.30	97.50
	SDB	Prepared for and participated in meeting with L. Krupnick re advice on HOA lawsuits and likelihood of success in our case.	325.00	0.90	292.50
	SDB	Reviewed Order and drafted supplemental letter to W. Ehrlich; emailed same to clients.	325.00	1.50	487.50
09/26/2021	SDB	Reviewed client emails, research re licensing issue for VRBO, notes to file, email to clients re licensing issue and real estate agent question.	325.00	0.80	260.00
09/27/2021	SDB	Reviewed A. Bhola email, reviewed B. Jones email; responded to same; meet and confer with K. Spates re finalizing letter.	325.00	0.20	65.00
09/28/2021	SDB	Reviewed Horton v. <i>Hartsook</i> and made notes; finalized Ehrlich letter; emailed clients re revisions to letter; meet and confer with K. Spates re sending letter.	325.00	1.30	422.50
	SKS	Proof final of letter to Ehrlich, finalize and preparation of e-mail and US Mail. BCC to all parties.	175.00	0.20	35.00
09/29/2021	SDB	Reviewed posting from HOA, responded to email with suggested response for clients (0.9); reviewed A. Bhola email, reviewed Cove CC&R, drafted response to A. Bhola email (0.4).	325.00	1.30	422.50
09/30/2021	SDB	Reviewed A. Bhola email re land contract and responded to same.	325.00	0.10	32.50
		FOR CURRENT SERVICES RENDERED		12.80	4,040.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	12.00	\$325.00	\$3,900.00
Sharon Kay Spates	0.80	175.00	140.00

09/16/2021	Postage	0.73
09/30/2021	Postage	0.53
	<b>TOTAL EXPENSES</b>	<u>1.26</u>

**TOTAL CURRENT WORK** 4,041.26

PAYMENTS thru 10/01/2021

09/02/2021	Payment Received (Thank You) Trust Ck# 5177	-2,500.00
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**PLEASE REMIT THIS BALANCE** \$7,684.01

Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$2,500.00
09/01/2021	Payment for legal services. Thank you. PAYEE: Dyer Bregman & Ferris, PLLC (2)	-2,500.00

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

Page: 3  
09/30/2021  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 3

**Remaining Trust Balance**

\$0.00

PAYMENT DUE UPON RECEIPT.  
ONLINE CREDIT CARDS AND eCHECKS ACCEPTED. CLICK ON COVER  
PAGE LINK.  
**Payment received after statement date is reflected on next month's billing**  
T.I.N. 81-0946829

**DYER BREGMAN & FERRIS, PLLC**  
**Attorneys at Law**  
**3411 North 5th Avenue, Suite 300**  
**Phoenix, Arizona 85013**  
**(602) 254-6008**

Amy Sue Bhola  
5200 East Camino Apolena  
Tucson AZ 85718

Page: 1  
10/31/2021  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 4

Amy Bhola et. al v. Shores HOA

			PREVIOUS BALANCE			\$7,684.01
				RATE	HOURS	
10/04/2021	SDB	Reviewed A. Bhola's email re Cove HOA past president information and Executive Session, responded to same with meeting request and potential idea for resolution on Motions.		325.00	0.30	97.50
10/06/2021	SDB	Reviewed A. Bolah email and responded to same re meeting and next steps.		325.00	0.10	32.50
10/11/2021	SDB	Email to clients re update from Executive Session and information for scheduling GoToMeeting call.		325.00	0.10	32.50
	SDB	Reviewed A. Bolah email, responded to same re appeal and setting up meeting.		325.00	0.10	32.50
10/12/2021	SKS	Review of e-mail from Amy regarding teleconference, input of e-mail addresses for parties, set up GoToMeeting, preparation of e-mail correspondence regarding same.		175.00	0.40	70.00
	SDB	Reviewed A Bhola email re leasing restrictions, responded to same explaining foreseeability argument.		325.00	0.20	65.00
10/13/2021	SDB	Prepared for and participated in GoToMeeting call with clients (0.9); call with ethics counsel and follow up email re group representation (0.4); call and follow up email to W. Ehrlich re setting a phone call (0.1).		325.00	1.40	455.00
10/14/2021	SDB	Reviewed L. Shely email re contract for other homeowners who do not want to be named on the pleading; email to C. Dyer re same; meet and confer with C. Dyer re best practice for this group representation and follow up email re same.			0.50	no charge
10/15/2021	SDB	Receipt and review <b>Credit Card Payment, dated October 15, 2021, in the amount of \$7,684.01, from Albert A. Callie</b>			0.20	no charge
10/21/2021	SDB	Reviewed B. Jones email and responded to same (0.1); Answered questions from A. Bolah and B. Jones (0.4); prepare for and participate in call with R. Carter re procedural strategy for Complaint (0.9); prepared for and participated in call with W. Ehrlich (1.0).		325.00	2.40	780.00
10/26/2021	SDB	Reviewed A. Bolah email and responded to same explaining HOA's position on the First Amendment.		325.00	0.70	227.50

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

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10/31/2021  
ACCOUNT NO: 2021335-00A  
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			RATE	HOURS	
10/27/2021	SDB	Reviewed W. Ehrlich letter and forwarded it to clients along with explanation of licensing argument and included Illinois case on licensing.	325.00	0.30	97.50
10/29/2021	SDB	Reviewed B. Jones email and responded to same explaining license.	325.00	0.50	162.50
		FOR CURRENT SERVICES RENDERED		6.50	2,052.50
		Current Non-Billable Hours		0.70	

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	6.10	\$325.00	\$1,982.50
Sharon Kay Spates	0.40	175.00	70.00

TOTAL CURRENT WORK

2,052.50

PAYMENTS thru 11/05/2021

10/15/2021 Credit Card Payment Received. (Thank you).



**PLEASE REMIT THIS BALANCE**

**\$2,052.50**

PAYMENT DUE UPON RECEIPT.  
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11/30/2021  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 5

Amy Bhola et. al v. Shores HOA

		PREVIOUS BALANCE			\$2,052.50
			RATE	HOURS	
11/01/2021	SDB	Reviewed client emails re meeting and language for licensing agreement; email to R. Carter re bad faith claim against HOA board member and notes to file re same; email K. Spates re scheduling and conference call.	325.00	0.50	162.50
	SKS	Preparation of e-mail correspondence regarding instructions for using conference bridge for teleconference on 11-2-2021.		0.20	no charge
	SKS	Receipt and review of correspondence from Wendy Ehrlich dated October 27, 2021.		0.20	no charge
11/02/2021	SKS	Preparation of e-mail correspondence regarding time of conference call.	175.00	0.20	35.00
	SDB	Reviewed case law and made notes as to best course of action to proceed for lawsuit (1.1) participated in call with clients (1.2); email to R. Carter re assistance with litigation (0.1).	325.00	2.40	780.00
11/03/2021	SDB	Meeting with M. Klopp counsel who handled <i>Dreamland Villa Community Club, Inc. v. Raimey</i> .		1.40	no charge
11/07/2021	SKS	Review of e-mail exchange between Attorneys Banfield and Rick Carter, preparation of response and calendar meeting.	175.00	0.20	35.00
11/10/2021	SDB	Prepared for and participated in meeting with R. Carter re course of action for hearing (1.8); reviewed client email with parties and responded to same (0.1).	325.00	1.90	617.50
11/11/2021	SDB	Receipt and review Credit Card Payment, dated November 11, 2021, in the amount of \$2,052.50, from Albert A. Callie.		0.20	no charge
	SDB	Reviewed A. Bohla email, drafted response and save to file (0.4); drafted email to ethics counsel requesting information on including indemnity provision in fee agreement for 10 clients (0.2); drafted email to clients about indemnity provision, R. Carter and Maricopa County Jurisdiction (0.3).	325.00	0.90	292.50
11/15/2021	SDB	Reviewed B. Jones email, A. Bhola email, and L. Shely email re best practice for representing homeowners, responded to same (0.9); meet and confer with K. Spates re fee agreement (0.2).	325.00	1.10	357.50
11/16/2021	SDB	Meet and confer with K. Spates re ethics issue, email to A. Bhola re points of contact, notes to file re same, reviewed response and			

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

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			RATE	HOURS	
		sent follow up email to A. Bhola and B. Jones.		0.50	no charge
11/17/2021	SDB	Reviewed A. Bhola email, meet and confer with C. Dyer, instruct K. Spates re language for fee agreement based upon advice from ethics counsel (0.6).		0.70	no charge
11/18/2021	SDB	Reviewed Legal Services Agreement and added language re Joint Representation and Attorneys Fees' liability.		1.30	no charge
11/19/2021	SKS	Discussion with SDB regarding language to use when sending all the separate LSAs. Preparation of e-mail to parties.		0.30	no charge
	SKS	Drafting of Conflict of Interest Waivers, implement revisions, finalize all Conflict of Interest Waivers for case.		1.80	no charge
	SDB	Reviewed A. Bhola email, meet and confer with K. Spates re Legal Services Agreement and respond to same (0.4 N/C); call with homeowner re Quit Claim Deed (0.2); revised conflict waiver and finalize Legal Services Agreement and instruct C. Bolton re emailing (0.6 N/C).	325.00	0.20	65.00
11/21/2021	SDB	Pulled corporate information on HOA's for jurisdiction issues; draft email to R. Carter with conflict information and update on the next steps; notes to file re next steps with the litigation.	325.00	0.50	162.50
11/23/2021	SDB	Reviewed J. West email, reviewed signed Legal Service Agreements, draft email to A. Bhola and B. Jones with update on J. West backing out and next steps (0.5); reviewed A. Bhola email and responded to same, meet and confer with K. Spates re next steps, calendared response time to follow up (0.2).		0.70	no charge
11/30/2021	SDB	Meet and confer with B. Jones re fee agreement, next steps in litigation, and timing.		0.50	no charge
	CLB	Emailed update to council regarding Legal Service Agreement status's among Homeowners.		0.30	no charge
	SDB	Reviewed R. Carter email, meet and confer with C. Bolton, email to A. Bohal re Fee Agreements and Trust, email to R. Carter re same.		0.50	no charge
		FOR CURRENT SERVICES RENDERED		7.90	2,507.50
		Current Non-Billable Hours		8.60	

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	7.50	\$325.00	\$2,437.50
Sharon Kay Spates	0.40	175.00	70.00

TOTAL CURRENT WORK 2,507.50

PAYMENTS thru 12/06/2021

11/11/2021 Credit Card Payment Received. (Thank you). 2,052.50

**PLEASE REMIT THIS BALANCE** **\$2,507.50**

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

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11/30/2021  
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12/31/2021  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 6

Amy Bhola et. al v. Shores HOA

			PREVIOUS BALANCE			\$2,507.50
				RATE	HOURS	
12/02/2021	CLB	Scanned and filed Legal Services Agreement for Lakeside Family Investments as well as scanned over a copy to the McJunkin's for their records.			0.30	no charge
12/08/2021	CLB	scanned and filed signed Legal Services Agreement as well as sent a copy via email to Client Agent of 854 Pine Creek, LLC			0.30	no charge
12/09/2021	SDB	Reviewed client file, update on status of retainer, email to B. Jones re next step in litigation, email to A. Bohal and B. Jones re next retainers and next steps.			0.50	no charge
12/10/2021	SDB	Call with A. Bolah (0.4); call with Steve (0.8); call with B. Jones (0.3); reviewed A. Bhola email, call with office re questions on litigation, drafted (0.2); drafted email to A. Bhola explaining litigation strategy and what the homeowners should expect (0.6)		325.00	2.30	747.50
	SDB	Reviewed B. Jones email and meet and confer with K. Spates re conflict and next steps; call with B. Jones re same.		325.00	0.70	227.50
12/13/2021	SDB	Reviewed B. Jones email, call with office, email to R. Carter re status, email to A. Karma re contract between homeowners (0.4); prepare for and participate in call with R. Carter and M. Kloop, notes to file re same (0.8).		325.00	1.20	390.00
12/14/2021	SDB	Reviewed A. Bhola email with updates and responded to same (0.6); reviewed A. Bhola email and responded to same re Legal Services Agreement and next steps to move forward (0.2); reviewed A. Bhola email and responded to same re Navajo County (0.1).		325.00	0.90	292.50
12/15/2021	SDB	Reviewed client file and made notes (1.2); began drafting Complaint (2.3).		325.00	3.50	1,137.50
12/16/2021	SDB	Read and took notes on <i>Dreamland Villa Community Club, Inc. v. Raimy</i> to incorporate argument into Complaint (0.9); drafted email to R. Carter with CCR's (0.2); completed first draft of Complaint (4.0).		325.00	5.10	1,657.50
12/17/2021	SDB	Completed Preliminary Injunction.		325.00	1.50	487.50

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

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12/31/2021  
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			RATE	HOURS	
12/19/2021	SDB	Reviewed client email, reviewed file and notes, responded to same.	325.00	0.60	195.00
12/20/2021	CLB	Legal Services Agreement recieved, scanned, filed and copy of complete version of agreement sent over to client for Steve & Sandra Kernagis regarding the Shores HOA.		0.25	no charge
	SDB	Reviewed dissent in Klasko case.	325.00	0.70	227.50
12/22/2021	SDB	Revised Complaint adding First Amendment and new provisions from Declaration.	325.00	1.90	617.50
12/26/2021	SDB	email M. Klopp and R. Carter re status of injunction, timing, and conference call; email K. Spates re same; email to A. Bhola re call and next steps.	325.00	0.20	65.00
	SDB	Reviewed A. Bhola email and responded to same; forward same to R. Carter with email on strategy.	325.00	0.20	65.00
12/27/2021	SDB	Meet and confer with M. Klopp and R. Carter re injunction and strategy for litigation (0.7); planned for and participated in conference call with M. Klopp, A. Bhola, and R. Carter (1.5).	325.00	2.20	715.00
	SDB	Email case to A. Bhola.	325.00	0.10	32.50
12/28/2021	SDB	Reviewed M. Klopp email and responded ot same (0.1); reviewed A. Bhola email and link, forwarded same to M. Klopp (0.1); reviewed M. Klopp email with strategy and responded to same (0.1).	325.00	0.30	97.50
12/29/2021	SDB	Reviewed M. Klopp email, meet and confer with C. Senteno re title search, call with M. Klopp re missing declaration, notes to file re same, follow up email to C. Senteno clarifying title search.	325.00	0.70	227.50
		FOR CURRENT SERVICES RENDERED		22.10	7,182.50
		Current Non-Billable Hours		1.35	

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	22.10	\$325.00	\$7,182.50

12/01/2021	Incoming wire fee	no charge
	TOTAL CURRENT WORK	7,182.50

PAYMENTS thru 01/27/2022

12/10/2021	eCheck Online Payment Received by Amy Bhola. Thank you.	
	<b><u>PLEASE REMIT THIS BALANCE</u></b>	<b><u>\$7,182.50</u></b>

Your Trust Account Activity

Trust Beginning Balance \$0.00

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

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12/31/2021  
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12/14/2021	Advance funds from Amy Bhola. Thank you.	5,000.00
12/15/2021	Advance funds from Amy Bhola. Thank you.	<u>7,500.00</u>
	<b>Remaining Trust Balance</b>	<b>\$12,500.00</b>

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01/31/2022  
ACCOUNT NO: 2021335-00A  
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Amy Bhola et. al v. Shores HOA

			PREVIOUS BALANCE			\$7,182.50
				RATE	HOURS	
01/04/2022	SDB	Reviewed A. Bhola email re TRO and meeting notes and forwarded to M. Klopp with questions (0.2); reviewed A. Bhola email with certified letter from HOA and responded to same (0.1); reviewed M. Klopp emails and responded to same re next steps and how to keep clients informed (0.1).		325.00	0.40	130.00
01/05/2022	SDB	Reviewed M. Klopp email and demand letter, responded to same asking for edits and clean copies of the documents.		325.00	0.30	97.50
01/06/2022	SKS	Review of e-mail from Matt Klopp regarding LSA's and preparation of response.		175.00	0.20	35.00
	SDB	Reviewed M. Klopp emails and responded to same; reviewed A. Bhola email and responded to same with questions on demand letter, notes to file re same; follow up email to A. Bhola re issues with the fines from HOA.		325.00	0.70	227.50
01/07/2022	SDB	Reviewed 33-420 letter, complaint and motion, email A. Bhola with same.		325.00	0.70	227.50
01/09/2022	SDB	Reviewed client emails and notes to file re same.		325.00	0.30	97.50
01/11/2022	CLB	Phone call out to Wong & Carter to set up phone meeting with SDB and Mr. Klopp to discuss Shores HOA Matter. Meeting set for 4:30 on 1-11-22			0.25	no charge
	SDB	Prepared for and participated in call with M. Klopp re changes to Complaint and procedural issues.		325.00	0.80	260.00
01/14/2022	SDB	Reviewed letter from HOA to homeowners, saved to file, notes re same and emailed to co-counsel (0.2); reviewed emails from A. Bhola and pulled names for retention and litigation, drafted email to A. Karam, notes to file re same. (0.4).		325.00	0.60	195.00
01/18/2022	SDB	Reviewed R. Carter email re consent from homeowners, notes to file, confirm list of homeowners in which consent was requested, draft email to R. Carter with proposed parties to Complaint and notes to file re same (0.5); reviewed R. Carter email approving email to homeowners, drafted email to C. Bolton and K. Spates with language for email to proposed homeowners and instructions for sending (0.4); reviewed R. Carter's email and revised proposed				

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

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01/31/2022  
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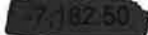
			RATE	HOURS	
		language to homeowners in email to K. Spates and C. Bolton (0.1); email to R. Carter re motion for preliminary injunction questions (0.1).	325.00	1.10	357.50
01/21/2022	SDB	Reviewed A. Bhola email regarding public hearing and responded to same (0.1); drafted email to R. Carter and M. Klopp re strategy for public hearing (0.2); meet and confer with K. Spates, follow up email to R. Carter re attending hearing (0.1).	325.00	0.40	130.00
01/24/2022	SKS	Review of e-mail correspondence regarding setting up conference call, obtain available bridge line, preparation of e-mail correspondence to parties regarding same.	175.00	0.20	35.00
	SDB	Prepared for and participated in call with A. Bhola and other homeowners (0.7); drafted email to M. Klopp re edits to Complaint and statutory deadline (0.2); reviewed M. Klopp response, pulled Rule 8, and drafted reply and opinion on verification (0.3); reviewed A. Bhola email to A. Karam and A. Karam's response (0.1); reviewed A. Bhola email with email from R. Whipple and responded to same (0.1).	325.00	1.40	455.00
01/27/2022	SKS	Preparation of check request for payment of Wong Carter Fees.		0.10	no charge
01/28/2022	SDB	Reviewed emails re board meeting and complaint, draft email to M. Klopp re suggested changes, email A. Bhola re revised complaint.	325.00	0.30	97.50
01/30/2022	SDB	Reviewed email from M. Klopp and respond to same in re amended complaint.	325.00	0.20	65.00
		FOR CURRENT SERVICES RENDERED		7.60	2,410.00
		Current Non-Billable Hours		0.35	

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	7.20	\$325.00	\$2,340.00
Sharon Kay Spates	0.40	175.00	70.00

TOTAL CURRENT WORK 2,410.00

PAYMENTS thru 02/09/2022

01/27/2022 Payment Received (Thank You) Trust Ck# 6482 

**PLEASE REMIT THIS BALANCE** \$2,410.00

Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$12,500.00
01/21/2022	Advance eCheck funds received from Amy Bhola. Thank you.	5,000.00

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

Page: 3  
01/31/2022  
ACCOUNT NO: 2021335-00A  
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01/25/2022	Advance eCheck funds from Amy Bhola. Thank you.	5,000.00
01/27/2022	Payment for legal services. Thank you. PAYEE: Dyer Bregman & Ferris, PLLC (2)	-7,182.50
	<b>Remaining Trust Balance</b>	<u>\$15,317.50</u>

PAYMENT DUE UPON RECEIPT.  
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02/28/2022  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 8

Amy Bhola et. al v. Shores HOA

			PREVIOUS BALANCE	\$2,410.00
			RATE	HOURS
02/01/2022	SKS	Preparation of e-mail to Klopp and Carter regarding teleconference.	175.00	0.10
	SDB	Reviewed final Complaint and Motion for Preliminary Injunction (1.1); call with R. Carter and M. Klopp (0.4); reviewed A. Bhola email and drafted response including Complaint and Injunction (0.5).	325.00	2.00
				17.50
				650.00
02/03/2022	SDB	Reviewed A. Bhola email, email to M. Klopp re changes, reviewed M. Klopp response and drafted follow email re parties, reviewed response and called M. Klopp to verify changes to Complaint (0.6); reviewed M. Klopp email, call to A. Bhola re change to Complaint, notes to file, respond to R. Carter email re change (0.4); email exchange with M. Klopp, call with L. McJunkin re legal signature requirements for Lakeside Family Investments, LLC, email to M. Klopp re same (0.5).	325.00	1.60
	SDB	Reviewed A. Bhola email with verification, forwarded same to M. Klopp (0.1); drafted email to A. Bhola with revised Complaint and list of homeowners who turned in verification (0.1).	325.00	0.20
				520.00
				65.00
02/04/2022	SDB	Reviewed A. Bhola email and forwarded same to M. Klopp for revision (0.2).	325.00	0.20
	SDB	Reviewed email from A. Bhola, reviewed email from M. Klopp, reviewed email from R. Carter, notes to file re same (0.3); call with A. Karam re litigation agreement (0.2); call with A. Bhola re litigation agreement and problems with litigating by committee (0.3); follow up email to R. Carter and M. Klopp re litigation agreement (0.1); reviewed R. Bryson email and made notes to file (0.1); reviewed email from M. Klopp and R. Carter, email to A. Bhola re same (0.1); follow up call with A. Bhola re Litigation Agreement (0.1).	325.00	1.20
				65.00
				390.00
02/07/2022	SDB	Reviewed A. Bhola email and R. Bryson changes, forwarded same to M. Klopp and R. Carter, notes to file re same (0.3); reviewed A. Bhola email and replied to same, forwarded verification to M. Klopp (0.1); organized Verifications and sent email to A. Bhola to confirm accuracy (0.3); reviewed R. Carter email re meeting and representation and responded to same (0.1); emailed A. Bhola re Quiet Title letter and all parties being on the Complaint (0.1); reviewed A. Bhola email re conference call, responded to same (0.1); draft email to R. Bryson regarding Quiet Title letter and conference call with R. Carter and M. Klopp and notes to file re		

			RATE	HOURS	
		same (0.2); follow up email to R. Carter re privilege and conference call (0.1)	325.00	1.30	422.50
02/08/2022	SKS	Review of e-mail correspondence from Rick Bryson and Attorney Banfield, preparation of e-mail correspondence to Attorneys Carter and Klopp regarding possible dates and times for teleconference.	175.00	0.20	35.00
	SKS	Review of various responses regarding available dates and times from Carter and Klopp. Preparation of e-mail correspondence to Carter, Klopp, Bryson, Bhola regarding available times.	175.00	0.20	35.00
	SKS	Phone message from Rick Bryson, preparation of e-mail correspondence to all parties regarding teleconference.	175.00	0.20	35.00
	SDB	Planned for and participated in conference call with A. Bhola, R. Bryson, R. Carter and M. Klopp, notes to file re same (0.9); reviewed verifications, reviewed email, email to A. Bhola re missing verifications (0.5).	325.00	1.40	455.00
02/09/2022	SDB	Reviewed M. Klopp email and revised complaint, extracted verifications, drafted email to A. Bhola with the verifications (0.4); call with A. Bhola re new parties and update on R. Bryson (0.3); reviewed M. Klop email and responded to same re Quiet Title letter (0.1)	325.00	0.80	260.00
02/10/2022	SDB	Reviewed verifications and forwarded same to M. Klopp (0.1); email exchange with M. Klopp re filing complaint, verification and next steps (0.2); reviewed A. Bhola email with HOA letter attached and drafted response and copied M. Klopp (0.3); reviewed M. Klopp email re filing and responded to same (0.1).	325.00	0.70	227.50
	SDB	Drafted email to R. Carter re case management.		0.70	no charge
02/11/2022	CLB	Printed and filed electronically/hard filed email attachments regarding the Shores HOA matter		0.50	no charge
	SDB	Reviewed M. Klopp email, responded to same re Acceptance of Service, call W. Ehrlich and left message, reviewed M. Klopp email exchange with J. Rathbun, notes to file re same.	325.00	0.40	130.00
02/13/2022	SDB	Reviewed R. Carter email and M. Klopp email re service; responded to same with service information.	325.00	0.10	32.50
02/14/2022	SKS	Review of Arizona Corporation Commission website regarding statutory agent for service of process. Phone call to process server regarding service in Lakeside to be performed today.	175.00	0.40	70.00
	SDB	Reviewed A. Bhola email and forwarded same to M. Klopp re attending HOA meeting (0.1).	325.00	0.10	32.50
02/17/2022	SDB	Receipt and review of billing from Wong & Carter.	325.00	0.20	65.00
	SDB	Reviewed A. Bhola email and M. Klopp response, responded to same re injunction and next steps (0.3); reviewed R. Carter's email re injunction and meeting and setting up conference call, responded to same (0.1); reviewed email notice from HOA and made notes to file (0.1); participate in conference call with M. Klopp and R. Carter and made notes to file (0.4); draft email to W. Ehrlich re conference call (0.1).	325.00	1.00	325.00
	SKS	Filing of Acceptance of Service with TurboCourt.	175.00	0.20	35.00
02/18/2022	SKS	Preparation of e-mail correspondence to Rick Carter regarding			

Amy Bhola et. al v. Shores HOA

			RATE	HOURS	
		meeting with SDB.	175.00	0.20	35.00
	SDB	Reviewed W. Ehrlich email re conference call and responded to same with follow up questions (0.4)	325.00	0.40	130.00
02/22/2022	SKS	Review of response from Carter regarding meeting, calendar and reply.	175.00	0.20	35.00
02/23/2022	SKS	Review of e-mail correspondence from Carter regarding possible rescheduling of meeting on 2-23-2022 with SDB and preparation of response. Block off calendar.		0.20	no charge
02/24/2022	SDB	Call with W. Ehrlich (0.1), reviewed client file and email to A. Bhola re W. Ehrlich call (0.2); meet and confer with R. Carter and M. Klopp re result of call (0.1).	325.00	0.40	130.00
	SDB	Appeared for and attended meeting with R. Carter re budget for litigation and next steps.		2.20	no charge
		<b>FOR CURRENT SERVICES RENDERED</b>		<u>13.70</u>	<u>4,197.50</u>
		Current Non-Billable Hours		3.60	

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	12.00	\$325.00	\$3,900.00
Sharon Kay Spates	1.70	175.00	297.50

TOTAL CURRENT WORK 4,197.50

PAYMENTS thru 02/28/2022

02/10/2022      Payment Received (Thank You) Trust Ck# 6527 ~~10,000.00~~

**PLEASE REMIT THIS BALANCE** \$4,197.50

Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$15,317.50
02/02/2022	Payment for legal services. Invoice 07899	
	PAYEE: Rick K. Carter, Esq.	-10,000.00
02/10/2022	Payment for legal services. Thank you.	
	PAYEE: Dyer Bregman & Ferris, PLLC (2)	-2,410.00
02/17/2022	eCheck OL Advance funds received from Amy Bhola. Thank you.	2,500.00
02/28/2022	Attorney Fees. Invoice 07899	
	PAYEE: Rick K. Carter, Esq.	-4,000.00
02/28/2022	Attorney fees. Invoice 07997	
	PAYEE: Rick K. Carter, Esq.	<u>-1,000.00</u>
	<b>Remaining Trust Balance</b>	<b>\$407.50</b>

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		PREVIOUS BALANCE			\$4,197.50
			RATE	HOURS	
03/01/2022	CLB	prepared letter to Rick Carter Esq. regarding checks totaling the amount of 5,000 for attorney's fees. Perfected mail and sent out checks and letter today.		0.50	no charge
	SDB	Reviewed A. Bhola message and responded to same (0.1); reviewed J. Csontos email and R. Carter and M. Klopp comments on insurance defense firm and responded to same (0.4); reviewed invoices and drafted email to A. Bhola re updated and next steps and need to put money in trust (0.4);	325.00	0.90	292.50
03/02/2022	SDB	Reviewed A. Bhola email and responded to same re call (0.1); reviewed J. Csontos email, gathered requested documents, responded to J. Csontos email (0.4); participated in conference call with A. Bola, J. Zehring and R. Carter re case strategy, costs, and next steps (1.0); follow up call with R. Carter re J. Csontos email and group call (0.2).	325.00	1.70	552.50
03/03/2022	SKS	Preparation of e-mail correspondence to Carter and Klopp regarding availability for conference call week of 3-8-2022.	175.00	0.10	17.50
	SKS	Review of responses from Carter and Klopp and preparation of e-mail correspondence to Csontos regarding setting up teleconference.	175.00	0.20	35.00
	SDB	Reviewed J. Costons email and responded to same, instructed K. Spates re call, reviewed R. Carter and M. Klopp response, notes to file re same.	325.00	0.30	97.50
03/07/2022	SKS	Preparation of follow up e-mail to Jim Csontos regarding teleconference.	175.00	0.20	35.00
03/08/2022	SKS	Review of responses from Carter, Klopp and Csontos and preparation of confirming e-mail for conference call on 3-9-2022.	175.00	0.20	35.00
	SKS	Preparation of e-mail correspondence to attorneys regarding conference bridge information for teleconference.	175.00	0.10	17.50
03/09/2022	SDB	Prepared for and participated in conference call with opposing counsel (0.5); drafted email to A. Bhola explaining call and the next steps (0.3); reviewed A. Bhola email and responded to same (0.1).	325.00	0.90	292.50
03/16/2022	SDB	Review R. Carter email and responded to same; email A. Bhola re collections and status.		0.20	no charge

Amy Bhola et. al v. Shores HOA

			RATE	HOURS	
	SKS	Review e-mail exchange between Banfield, Carter and Klopp regarding teleconference, schedule and preparation of confirming response.	175.00	0.10	17.50
03/17/2022	SDB	Revise Complaint adding additional party (0.2); participate in call with R. Carter and M. Klopp re next steps in litigation (0.3); follow up email to M. Klopp re amended complaint and next steps (0.1); review Klopp email and draft verification for the First Amended Complaint and email to A. Bhola re R. Kyer address (0.3).	325.00	0.90	292.50
03/18/2022	SDB	Reviewed A. Bhola email, drafted email to D. Kyer re FAC and verification, notes to file re same.	325.00	0.30	97.50
03/23/2022	SDB	Reviewed D. Kyer email, revised First Amended Complaint, and sent same to him with Verification (0.2); reviewed A. Bhola email and responded to same sending Kalway v. Calabria HOA decision (0.1); reviewed file and sent email to R. Carter re First Amended Complaint and status email to opposing counsel (0.2).	325.00	0.50	162.50
03/25/2022	SDB	Review M. Klopp letter to Attorney J. Csontos re blue penciled amendment (0.3); draft email to A. Bhola and J. Zehring including Attorney M. Klopp letter to J. Csontos (0.2); review M. Klopp email, review A. Bhola email, respond to same re client consent (0.2).	325.00	0.60	195.00
03/28/2022	JKH	Create new folder containing red-lined and clean copies of First Amended Complaint; Create PDF attaching all Verifications; Send email to Stockton regarding same.	175.00	1.30	227.50
	SDB	Review A. Bhola emails and M. Klopp responses, reply to same (0.1); review D. Kyer email and accompanying verification, respond to same inquiring about most recent letter to counsel and send email to J. Hull re finalizing First Amended Complaint (0.2); email to R. Carter and M. Klopp re filing First Amended Complaint and serving on opposing counsel (0.1); review Response to Preliminary Injunction (0.3);	325.00	0.70	227.50
03/29/2022	JKH	Format Redlined First Amended Complaint to move to new folder; Respond to Stockton's email with details of tasks performed on redlined and clean copies in Word and PDF format with verifications for his review.	175.00	0.70	122.50
	JKH	Review email from Stockton and complete request check from Trust account for legal fees to Rick Carter.	175.00	0.30	52.50
03/31/2022	SDB	Receipt and review of Answer to Complaint and Response to Preliminary Injunction.	325.00	0.30	97.50
	SDB	Receipt and review of invoice No. 08053 from Wong & Carter	325.00	0.20	65.00
		FOR CURRENT SERVICES RENDERED		10.50	2,932.50
		Current Non-Billable Hours		0.70	

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	7.30	\$325.00	\$2,372.50
Sharon Kay Spates	0.90	175.00	157.50
Janice K. Hull	2.30	175.00	402.50

Amy Sue Bhola

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03/01/2022	Postage	0.53
	TOTAL EXPENSES	0.53
	TOTAL CURRENT WORK	2,933.03
	<b><u>PLEASE REMIT THIS BALANCE</u></b>	<b><u>\$7,130.53</u></b>

Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$407.50
03/02/2022	eCheck OL Advance funds from Amy Bhola. Thank you.	1,218.49
03/15/2022	eCheck Online Advance funds from Amy Bhola. Thank you.	5,000.00
03/17/2022	eCheck Online Advance funds received from Amy Bhola. Thank you.	4,000.00
03/21/2022	Advance eCheck Online payment from Amy Bhola. Thank you.	2,500.00
03/30/2022	Payment for legal services. Invoice 07997 PAYEE: Rick K. Carter, Esq.	-13,125.99
	<b>Remaining Trust Balance</b>	<b>\$0.00</b>

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		PREVIOUS BALANCE			\$7,130.53
			RATE	HOURS	
04/04/2022	SDB	Receipt and review of Notice of Filing Exhibits for Response to Preliminary Injunction.	325.00	0.20	65.00
	CLB	Check Delivered to Wong & Carter today		0.50	no charge
	SDB	Review M. Klopp, R. Carter and Bhola emails re status of case, respond to R. Carter email re next steps, email A. Bhola re changes in case if fees are not paid, notes to file re same, follow up email to M. Klopp re hearing strategy (0.8); review M. Klopp email, R. Carter emails and A. Bhola email, respond to same (0.2)	325.00	1.00	325.00
04/05/2022	SDB	Call with A. Bhola re fees and next steps (0.4); participate in call with M. Klopp to prepare for return hearing on 4/6/2022 (0.6); draft email to A. Bhola re bill and included pleadings (0.2).	325.00	1.20	390.00
04/06/2022	SDB	Prepared for and participated in hearing, communicate with client re same, notes to file and review M. Klopp email re hearing and sent email to M. Klopp re summary.	325.00	1.40	455.00
04/08/2022	SDB	Review Stipulation and Order, email M. Klopp re revisions (0.3).	325.00	0.30	97.50
04/11/2022	SDB	Review M. Klopp email re MSJ, review R. Carter response, notes to file, respond to M. Klopp email (0.3)	325.00	0.30	97.50
04/20/2022	SDB	Review redlined changes to Stipulation and Order, email Attorney M. Klopp re changes and strategy communicating with opposing counsel (0.4); review R. Carter email and respond to same with comments re email to opposing counsel (0.2).	325.00	0.60	195.00
04/21/2022	SDB	Review Motion for Summary Judgment, email to M. Klopp with comments.	325.00	1.40	455.00
04/25/2022	SDB	Review A. Bhola email and respond to same re hearing (0.2); review Motion for Summary Judgment filed by M. Klopp and call with M. Klopp re same (0.7); follow up email to opposing counsel re First Amended Complaint (0.1).	325.00	1.00	325.00
04/29/2022	SDB	Receipt and review of April 21, 2022 billing from Wong and Carter.	325.00	0.20	65.00
		<b>FOR CURRENT SERVICES RENDERED</b>		<u>7.60</u>	<u>2,470.00</u>
		Current Non-Billable Hours		0.50	

Amy Sue Bhola

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RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	7.60	\$325.00	\$2,470.00

TOTAL CURRENT WORK 2,470.00

**PLEASE REMIT THIS BALANCE** **\$9,600.53**

Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$0.00
04/04/2022	eCheck OL Advance funds from Amy Bhola. Thank you.	3,500.00
04/12/2022	eCheck OL Advance funds from Amy Bhola. Thank you.	5,000.00
04/29/2022	eCheck Advance funds from Amy Bhola. Thank you.	3,000.00
	<b>Remaining Trust Balance</b>	<b>\$11,500.00</b>

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			PREVIOUS BALANCE			\$9,600.53
				RATE	HOURS	
05/04/2022	SDB	Call with opposing counsel (0.2); Revise Complaint and draft stipulation (0.5).		325.00	0.70	227.50
05/16/2022	SDB	Draft Stipulation and Order (0.3); reviewed First Amended Verified Complaint and pulled case information (0.2); drafted email to Attorney M. Klopp and J. Csontos with documents (0.1).		325.00	0.60	195.00
05/17/2022	JKH	Create check request for payment of fees to Rick Carter.			0.20	no charge
	SKS	Attempted phone call and preparation of e-mail correspondence to Amy regarding setting up teleconference for 5-18-2022.		175.00	0.20	35.00
05/18/2022	JKH	Prepare letter to Rick Carter enclosing check for payment of invoices.		175.00	0.50	87.50
	SDB	Prepare for and participate in call A. Bhola re status of case and accounting (0.8); follow up call with R. Carter re invoices and next steps in Motion for Summary Judgment (0.4).		325.00	1.20	390.00
05/23/2022	SDB	Receipt and review of May 19, 2022 billing from Wong & Carter.		325.00	0.20	65.00
06/05/2022	SDB	Review R. Carter email re status and respond to same (0.2); email to opposing counsel re stipulation (0.1); reviewed Response and Cross-Motion for Summary Judgment and drafted status email to clients (0.7).		325.00	1.00	325.00
06/06/2022	SKS	Calendar due dates for responses and oral argument on MSJ		175.00	0.30	52.50
06/07/2022	SDB	Email correspondence with Wong & Carter re invoices and withdrawing and follow up email to clients re same (1.5) (N/C); review J. Costano email and respond to same re stipulation and extension of time to file Response and Reply (0.2); call with Attorney R. Carter re status of litigation and follow up meeting with Attorney C. Dyer re same (0.7)		325.00	0.90	292.50
06/08/2022	SKS	Finalize Notice of First Extension of Time to File Reply to Response to Motion for Summary Judgment. Filing same through Turbo Court.		175.00	0.50	87.50
06/10/2022	SDB	Review A. Bhola email and respond to same with answers to questions.		325.00	0.20	65.00

Amy Sue Bhola

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			RATE	HOURS	
06/14/2022	SDB	Reviewed A. Bhola email, reviewed R. Carter email, notes to file re same, responded to A. Bhola email (0.3); responded to P. Underwood email (0.1); email to Attorney C. Dyer re invoices (0.1); call with A. Bhola re status of payment and questions about next steps in the litigation (0.6).	325.00	1.10	357.50
06/15/2022	SDB	Receipt and review Credit Card Payment dated June 15, 2022 in the amount of \$5,000.00 from Amy Bhola		0.20	no charge
	SDB	Call with A. Bhola re payment and best way to make it (0.2); email to R. Carter re payment (0.1); Call with R. Carter confirming payment process (0.1); meet and confer T. Brown re payment options and send email to A. Bhola re best way to pay immediately (0.1); follow up call with R. Carter re next steps (0.1).	325.00	0.60	195.00
06/17/2022	SDB	Review S. Klinger text and call with same re HOA addendum (0.2); email to R. Carter and M. Klopp re HOA addendum (0.1).	325.00	0.30	97.50
06/22/2022	SKS	Preparation of check request for Rick Carter for April and May invoices to bring balance current.	175.00	0.20	35.00
06/27/2022	SDB	Receipt and review of Wong & Carter Invoice 08200 for June 2022.	325.00	0.20	65.00
		FOR CURRENT SERVICES RENDERED		8.70	2,572.50
		Current Non-Billable Hours		0.40	

RECAPITULATION

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
Stockton D. Banfield	7.00	\$325.00	\$2,275.00
Sharon Kay Spates	1.20	175.00	210.00
Janice K. Hull	0.50	175.00	87.50

05/18/2022	Postage	0.53
06/08/2022	Turbo Court - e-File and e-Serve - American Express	10.61
06/14/2022	Refund of overpayment. Dyer Bregman & Ferris IOLTA	113.94
	TOTAL EXPENSES	125.08
	TOTAL CURRENT WORK	2,697.58

PAYMENTS thru 07/05/2022

05/05/2022	Payment Received (Thank You) Trust Ck# 6756	750.00
05/12/2022	eCheck Online Payment Received by Amy Bhola. Thank you.	2,500.00
05/14/2022	eCheck Online Payment Received by Amy Bhola. Thank you.	2,500.00
	TOTAL PAYMENTS thru 07/05/2022	5,750.00

**PLEASE REMIT THIS BALANCE**

**\$1,548.11**

Amy Sue Bhola

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Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$11,500.00
05/04/2022	Payment for legal services. Thank you. PAYEE: Dyer Bregman & Ferris, PLLC (2)	-5,750.00
05/17/2022	Final pmt on Feb 2022 Inv# 07997 and partial pmt on March 2022 Inv# 8053 PAYEE: Rick K. Carter, Esq.	-5,750.00
06/10/2022	CC Advance funds from Amy Bhola. Thank you.	4,500.00
06/13/2022	eCheck OL Advance funds from Amy Bhola. Thank you.	5,000.00
06/16/2022	CC Advance funds from Amy Sue Bhola. Thank you.	5,000.00
06/17/2022	Return overpayment to Trust.	113.94
06/17/2022	eCheck OL Advance funds from Amy Bhola. Thank you.	2,500.00
06/24/2022	Payment of invoices #08102 - April & 08156 - May. PAYEE: Rick K. Carter, Esq.	-16,751.24
	<b>Remaining Trust Balance</b>	<u>\$362.70</u>

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			RATE	HOURS	
PREVIOUS BALANCE					\$1,548.11
07/03/2022	SDB	Review Reply and Response, make revisions, email to Attorneys M. Klopp and R. Carter with edits and comments.	325.00	1.70	552.50
07/05/2022	SDB	Review revised Reply/Response and email Attorney M. Klopp with approval.	325.00	0.40	130.00
07/08/2022	SDB	Review A. Bhola email and respond to same (0.2); email M. Klopp re Kalaway decision (0.1); email R. Carter re oral argument (0.1); email A. Bhola re updated pleadings (0.1).	325.00	0.50	162.50
07/10/2022	SDB	Review email from R. Carter and respond to same (0.1); email M. Klopp re oral argument (0.1); email A. Bhola re parties to Complaint (0.1)	325.00	0.30	97.50
07/13/2022	SDB	Review M. Klopp email and forward same to client (0.1); email to client re hearing (0.1); email to R. Carter and M. Klopp re hearing (0.1).	325.00	0.30	97.50
07/14/2022	SKS	Phone call to Judge Ruechel's JA Glenda regarding which location hearing on 7-18-2022 will be held.	175.00	0.20	35.00
	SKS	Numerous e-mails to/from Wong & Carter regarding First Amended Complaint and Oral Argument set for 7-18-2022.	175.00	0.50	87.50
07/18/2022	SDB	Participate in oral argument.	325.00	1.70	552.50
		FOR CURRENT SERVICES RENDERED		5.60	1,715.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stockton D. Banfield	4.90	\$325.00	\$1,592.50
Sharon Kay Spates	0.70	175.00	122.50

TOTAL CURRENT WORK 1,715.00

PAYMENTS thru 07/31/2022

07/19/2022 eCheck Online Payment Received by Amy Bhola. Thank you. -1,548.11

Amy Sue Bhola

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**PLEASE REMIT THIS BALANCE**

**\$1,715.00**

Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$362.70
07/16/2022	eCheck OL Advance funds from Amy Bhola. Thank you.	5,000.00
07/19/2022	eCheck OL Advance funds from Amy Bhola. Thank you.	<u>3,451.89</u>
	<b>Remaining Trust Balance</b>	<b>\$8,814.59</b>

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PREVIOUS BALANCE				\$1,715.00
	<u>RATE</u>	<u>HOURS</u>		
08/08/2022	SKS	Check request for payment of Rick Carter's Fees.	175.00	0.20      35.00
08/10/2022	SKS	E-mail to Carter regarding check delivery		0.10      no charge
08/22/2022	SDB	Receipt and review of invoice 08298 from Wong & Carter.	325.00	0.20      65.00
		FOR CURRENT SERVICES RENDERED		0.40      100.00
		Current Non-Billable Hours		0.10

<u>TIMEKEEPER</u>	<u>RECAPITULATION</u>		<u>TOTAL</u>
	<u>HOURS</u>	<u>HOURLY RATE</u>	
Stockton D. Banfield	0.20	\$325.00	\$65.00
Sharon Kay Spates	0.20	175.00	35.00

TOTAL CURRENT WORK 100.00

PAYMENTS thru 08/31/2022

08/09/2022	Payment Received (Thank You) Trust Ck# 7023	715.00
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**PLEASE REMIT THIS BALANCE** \$100.00

Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$8,814.59
08/07/2022	eCheck Trust deposit from Amy Bhola. Thank you.	2,500.00
08/08/2022	Attorney fees - Invoice #08232 PAYEE: Rick K. Carter, Attorney at Law	-6,592.50
08/08/2022	Payment for legal services. Thank you. PAYEE: Dyer Bregman & Ferris, PLLC	-1,715.00
	<b>Remaining Trust Balance</b>	<u>\$3,007.09</u>

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

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08/31/2022  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 13

PAYMENT DUE UPON RECEIPT.  
ONLINE CREDIT CARDS AND eCHECKS ACCEPTED. CLICK ON COVER  
PAGE LINK.  
**Payment received after statement date is reflected on next month's billing**  
T.I.N. 81-0946829

**DYER BREGMAN & FERRIS, PLLC**  
**Attorneys at Law**  
**3411 North 5th Avenue, Suite 300**  
**Phoenix, Arizona 85013**  
**(602) 254-6008**

Amy Sue Bhola  
5200 East Camino Apolena  
Tucson AZ 85718

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09/28/2022  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 14

Amy Bhola et. al v. Shores HOA

PREVIOUS BALANCE \$100.00

			RATE	HOURS	
09/14/2022	SDB	Review Court ME on Motion for Summary Judgement (0.5); call with M. Klopp re same (0.1); call with A. Bhola re Court ME and next steps (0.3).	325.00	0.90	292.50
09/21/2022	SDB	Draft email to A. Bhola with update and notes to file re same.	325.00	0.50	162.50
09/22/2022	SKS	Review of e-mail correspondence from Wong & Carter regarding invoices, run all invoices from 7-30-2021 through August 30-2022 and preparation of e-mail correspondence response.	175.00	0.50	87.50
09/27/2022	MRR	Printed Billing Statements for Stockton D. Banfield review.		0.30	no charge
09/28/2022	SDB	Review M. Klop email (0.1); review fees and fee statement (0.4); draft Affidavit of Attorneys fees to include Wong & Carter's time (0.8); review and revise Fee Application (1.2); instruct K. Spates re filing (0.1); finalize fee Affidavit (0.2).	325.00	2.70	877.50
		<b>FOR CURRENT SERVICES RENDERED</b>		<b>4.60</b>	<b>1,420.00</b>
		Current Non-Billable Hours		0.30	

**RECAPITULATION**

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
Stockton D. Banfield	4.10	\$325.00	\$1,332.50
Sharon Kay Spates	0.50	175.00	87.50

TOTAL CURRENT WORK 1,420.00

PAYMENTS thru 09/28/2022

09/02/2022	Payment Received (Thank You) Trust Ck# 7087	-100.00
09/15/2022	eCheck Online Payment Received by Amy Bhola. Thank you.	-100.00
	<b>TOTAL PAYMENTS thru 09/28/2022</b>	<b>-200.00</b>

**PLEASE REMIT THIS BALANCE** **\$1,320.00**

Amy Sue Bhola

Amy Bhola et. al v. Shores HOA

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09/28/2022  
ACCOUNT NO: 2021335-00A  
STATEMENT NO: 14

Your Trust Account Activity

	<b>Trust Beginning Balance</b>	\$3,007.09
09/02/2022	Payment for legal services. Thank you. PAYEE: Dyer Bregman & Ferris, PLLC	-100.00
09/15/2022	eCheck OL Advance funds from Amy Sue Bhola. Thank you.	<u>3,000.00</u>
	<b>Remaining Trust Balance</b>	<b>\$5,907.09</b>

PAYMENT DUE UPON RECEIPT.  
ONLINE CREDIT CARDS AND eCHECKS ACCEPTED. CLICK ON COVER  
PAGE LINK.  
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T.I.N. 81-0946829