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11           *Attorneys for Defendant*

12   IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
13   IN AND FOR THE COUNTY OF MARICOPA

14           THOMAS J. GUSICH, an individual,  
15   Plaintiff,

16   v.

17           SUN CITY GRAND COMMUNITY  
18           ASSOCIATION, INC., an Arizona  
19           nonprofit corporation,  
20   Defendant.

NO. CV2025-002634

**DEFENDANT'S APPLICATION FOR  
ATTORNEYS' FEES AND COSTS**

(Assigned to the Hon. Jennifer Ryan-  
Touhill)

21           Pursuant to the Court's Ruling dated July 9, 2025, and filed July 11, 2025 (the  
22           "Ruling"), Defendant Sun City Grand Community Association, Inc. (the "Association" or  
23           "Defendant") submits this Application for Attorneys' Fees and Costs. The Association  
24           moves for an award of attorneys' fees in the amount of \$353,388 and taxable costs in the  
25           amount of \$355.85 for a total award of \$353,743.85. This Application is supported by the  
26           following Memorandum of Points and Authorities and the exhibits attached hereto,  
27           including the Declaration of Lauren Stine, attached hereto as **Exhibit A** (the "Stine  
28           Declaration"), and the Declaration of Curtis Ekmark, attached hereto as **Exhibit B** (the  
          "Ekmark Declaration").

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION & BACKGROUND.**

3 Plaintiff Thomas Gusich (“Plaintiff”) filed this lawsuit on January 22, 2025,  
4 asserting claims for declaratory judgment and breach of contract. Plaintiff sought a  
5 declaration that a code of conduct (the “Grand Standards”) adopted by the Board of  
6 Directors of the Association (the “Board”) was unenforceable—a code of conduct that  
7 Plaintiff helped draft, voted in favor of while he was a member of the Board, and which  
8 (ironically) Plaintiff attempted to enforce against another member of the Board. Plaintiff  
9 also alleged that the Association breached an obligation under the Governing Documents  
10 to indemnify Plaintiff in connection with his dispute with the Board.

11 Dissatisfied with Plaintiff’s conduct and performance as a Board member, a group  
12 of residents within the Association circulated a petition to have Plaintiff recalled and  
13 removed from his position. The petition (the “Petition”) began circulating in November  
14 2024 and was submitted to the Association on February 7, 2025. On February 10, 2025,  
15 the Association sent notice to all members—including Plaintiff—via email that the Petition  
16 had been received, that it included a sufficient number of valid signatures to compel a  
17 special meeting and vote, and that the Board would hold a special meeting on the Petition  
18 on February 24, 2025 (the “Special Meeting”). The Association also sent a written notice  
19 of the Special Meeting to all members—including Plaintiff—by mail on February 12, 2025.

20 Despite his actual knowledge of the Petition and Special Meeting, Plaintiff took no  
21 action whatsoever to contest the Petition until February 20, 2025—a mere two (2) business  
22 days before the Special Meeting. Only then, after the Association had already invested  
23 substantial time and money into preparing for the Special Meeting and after voting was  
24 already underway, did Plaintiff file a First Amended Complaint (“FAC”), Application for  
25 Preliminary Injunction (“PI Application”), and Application for an Order to Show  
26 Cause/Temporary Restraining Order (“OSC Application”).

27 Plaintiff’s First Amended Complaint added a claim for declaratory judgment, which  
28 sought a declaration that the Petition was invalid because it did not contain certain magic

1 language or take on some specific hyper-technical format. Plaintiff’s PI Application sought  
2 to enjoin the Association from conducting the Special Meeting.

3 No injunction was entered, and the Special Meeting went forward as scheduled on  
4 February 24, 2025. An overwhelming majority of the Grand members who cast votes—  
5 4,659 members (or 86.3%)—voted to remove Plaintiff from the Board. Due process was  
6 provided, the votes were cast and tallied, and the members of the Association spoke.  
7 Plaintiff was removed from the Board in accordance with the Association’s governing  
8 documents and Arizona law.

9 Rather than accept the overwhelming and manifest voice of the membership or  
10 acknowledge that his claims lacked merit or were otherwise moot as a result of the vote and  
11 Plaintiff’s removal from the Board, Plaintiff forged ahead and insisted that this Court  
12 schedule and hold a full-blown evidentiary hearing.

13 Ultimately, the Association prevailed across the board on each and every one of  
14 Plaintiff’s claims in the First Amended Complaint, as the Court granted the Association’s  
15 Motion to Dismiss in its entirety and with prejudice. The Court held that the Board was  
16 independently empowered under the Association’s Governing Documents and A.R.S. § 10-  
17 3808 to conduct the Special Meeting and recall vote and that Plaintiff failed to plead a  
18 justiciable controversy sufficient to state a claim for declaratory judgment. Ruling at 4–8.  
19 The Court ruled that Plaintiff lacked standing to challenge the Grand Standards because he  
20 was removed from, and therefore no longer a member of, the Board. *Id.* at 8–9. And, the  
21 Court ruled that Plaintiff’s claim for indemnification failed because the provision of the  
22 Governing Documents upon which the claim was based “does not mean what Plaintiff  
23 thinks it means” and Plaintiff was not entitled to indemnification pursuant to that provision.  
24 The Court further ordered that the Association was permitted to seek an award of attorneys’  
25 fees and costs incurred in defending itself.

26 As demonstrated below, the Association is entitled to a award of attorneys’ fees  
27 incurred in this matter on multiple independent bases, including a mandatory award of all  
28 attorneys’ fees and costs under Section 15.9 of the Association’s CC&Rs, a mandatory

1 award of fees and costs under A.R.S. § 33-1813(A)(4)(f), and an award of fees and costs  
2 under A.R.S. §§ 12-341 and 341.01.

3 **II. THE ASSOCIATION IS ENTITLED TO A MANDATORY AWARD OF ALL**  
4 **ATTORNEYS' FEES INCURRED UNDER THE CC&RS.**

5 Section 15.9 of the CC&Rs states, in pertinent part: “In the event of an action  
6 instituted to enforce any of the provisions contained in the Governing Documents, the party  
7 prevailing in such action **shall be entitled to recover from the other party** thereto as part  
8 of the judgment, attorneys’ fees and costs, including administrative and lien fees, of such  
9 suit.” *See* Declaration of René Mitchell,<sup>1</sup> Ex. 1 (CC&Rs) § 15.9 (emphasis added). The  
10 Declaration defines “Governing Documents” to include the CC&Rs, the Bylaws, Rules, and  
11 other Association documents. *Id.* § 1.19. Here, Plaintiff’s claims were predicated on alleged  
12 breaches of the Governing Documents.

13 Count One of the FAC sought a declaration that the Grand Standards, which were  
14 adopted pursuant to the Board’s authority under the Governing Documents, were invalid  
15 and unenforceable. *See* FAC, ¶ 15 (“The [CCR&Rs] authorizes the Board to adopt rules  
16 governing the Property, but not the speech and decisions of Board members and directors.”);  
17 PI Application at 11-14 (arguing that “[t]he Grand Standards have no footing in the  
18 Declaration, Bylaws, or any other governing documents”). Plaintiff also expressly alleged  
19 in the FAC that he was entitled to recover his attorneys’ fees and costs incurred in  
20 connection with Count One pursuant to the Governing Documents. FAC, ¶ 55.

21 Count Two of the FAC sought a declaration that the Petition was invalid because it  
22 did not comply with A.R.S. § 33-1813 and was not otherwise authorized under the terms of  
23 the Governing Documents or A.R.S. § 10-3808. *See* FAC, ¶¶ 56-64. In other words, Count  
24 Two sought a declaration that Plaintiff’s removal was impermissible under the terms of the  
25 Governing Documents. *See* PI Application at 8 (arguing that Petition did not comport with  
26 Section 3.5 the Association’s Bylaws).

27 \_\_\_\_\_  
28 <sup>1</sup> The Declaration of René Mitchell is attached as Exhibit A to Defendant’s Response to  
Plaintiff’s Application for a Preliminary Injunction, filed May 15, 2025.

1 Count Three of the FAC was a claim for breach of contract. Count Three alleged  
2 that the Declaration and Bylaws are binding contracts between Plaintiff and the Association,  
3 and that the Association breached an obligation to indemnify Plaintiff under the Bylaws.  
4 FAC, ¶¶ 65-71. Count Three expressly sought an award of attorneys' fees and costs under  
5 the Governing Documents. *See id.*

6 There can be no legitimate dispute that each of Plaintiff's claims qualifies as an  
7 "action to enforce" the Governing Documents and therefore falls squarely within the scope  
8 of Section 15.9. Nor can there be any dispute that the Association prevailed on each of  
9 these claims. Accordingly, the Association is entitled to an award of its attorneys' fees and  
10 costs under the Governing Documents.

11 Moreover, not only is an award of attorneys' fees and costs mandatory under the  
12 CC&Rs, but the Association is entitled to an award of *all* attorneys' fees and costs incurred  
13 in defending against Plaintiff's claims based on the plain language of Section 15.9 of the  
14 CC&Rs. *See McDowell Mountain Ranch Comm. Ass'n v. Simons*, 216 Ariz. 266 (App.  
15 2007).

16 **III. THE ASSOCIATION IS ENTITLED TO A MANDATORY AWARD OF**  
17 **ATTORNEYS' FEES UNDER A.R.S. § 33-1813(A)(4)(F).**

18 A.R.S. § 33-1813(A)(4)(f) expressly states that the prevailing party in an action  
19 concerning the removal of a member of a board of directors of a community association is  
20 entitled to a mandatory fee award: "If a civil action is filed regarding the removal of a board  
21 member, the prevailing party in the civil action **shall be awarded** its reasonable attorney  
22 fees and costs." (Emphasis added). There is no legitimate dispute that this lawsuit falls  
23 squarely within A.R.S. § 33-1813(A)(4)(f). Indeed, Plaintiff alleged in the FAC and  
24 Application for Preliminary Injunction that the Petition failed to comply with certain  
25 requirements set forth in A.R.S. § 33-1813 and specifically sought to invalidate the Petition  
26 under that statute. *See* FAC, ¶ 62; OSC Application at 1; PI Application at 8. The Court  
27 rejected Plaintiff's claim and granted the Association's Motion to Dismiss in its entirety.  
28 As such, the Association is the prevailing party in this action. *See* Ruling. Accordingly, in

1 addition to the CC&Rs, the Association is also entitled to an award of its reasonable  
2 attorneys' fees and costs under A.R.S. § 33-1813(A)(4)(f).

3 **IV. THE ASSOCIATION IS ENTITLED TO AN AWARD OF ATTORNEYS'**  
4 **FEES UNDER A.R.S. § 12-341.01.**

5 In addition to an award of attorneys' fees and costs under the terms of the Governing  
6 Documents and A.R.S. § 33-1813, the Association is entitled to an award under A.R.S.  
7 § 12-341.01, which provides that, "[i]n any contested action arising out of a contract,  
8 express or implied, the court may award the successful party reasonable attorney fees." This  
9 lawsuit is a contested action. There is no legitimate dispute that the Association was the  
10 successful party. And there is no dispute that each of Plaintiff's claims arises out of the  
11 Governing Documents for the reasons set forth in Part II, *supra*. Indeed, Plaintiff expressly  
12 alleged that his claims arose out of contract when he sought to recover attorneys' fees and  
13 costs under A.R.S. § 12-341.01. *See* FAC ¶¶ 55, 71 ("Plaintiff is entitled to recover his costs  
14 and attorneys' fees pursuant to . . . A.R.S §§ 12-341 & 12-341.01.").

15 Arizona courts look to the following six factors to determine whether attorneys' fees  
16 should be awarded under A.R.S. § 12-341.01: (1) the merits of the claim or defense  
17 presented by the unsuccessful party; (2) whether the litigation could have been avoided or  
18 settled and whether the successful party's efforts were completely superfluous in achieving  
19 the result; (3) whether assessing fees against the unsuccessful party would cause an extreme  
20 hardship; (4) whether the successful party prevailed with respect to all of the relief sought;  
21 (5) whether the legal question presented was novel, and whether such claim has been  
22 previously adjudicated in the jurisdiction; and (6) whether the award of attorneys' fees could  
23 deter other parties from litigating or defending legitimate contract issues for fear of  
24 incurring substantial attorneys' fees. *Associated Indem. Corp. v. Warner*, 143 Ariz. 567,  
25 570 (1985). These factors weigh heavily in favor of an award of fees.

26 For starters, Plaintiff's claims did not have merit. As reflected in the Ruling, the  
27 Court rejected each and every one of Plaintiff's claims and the arguments he put forth in  
28 response to the Association's Motion to Dismiss. The Association's efforts to defend itself

1 this action were entirely necessary to its resolution. There is also no indication that an award  
2 of the Association’s attorneys’ fees would impose a hardship on Plaintiff. Likewise, there  
3 is no evidence or reason to believe that awarding attorneys’ fees and costs would deter other  
4 parties from litigating legitimate contract issues. Rather, an award would only deter  
5 meritless claims, as A.R.S. § 12-341.01 is intended to do.

6 Because each of these *Associated Indemnity* factors militates in favor of an award,  
7 the Court should also grant the Association its attorneys’ fees under A.R.S. § 12-341.01.

8 **VI. THE ATTORNEYS’ FEES REQUESTED ARE REASONABLE.**

9 As noted in Section II *supra*, the Association is entitled to an award of all attorneys’  
10 fees and costs incurred pursuant to Section 15.9 of the CC&Rs. *See also McDowell*  
11 *Mountain Ranch Cmty. Ass’n*, 216 Ariz. at 266 (the fees set forth in the parties’ agreement  
12 is prima facie reasonable). However, as demonstrated below, the fees requested are also  
13 reasonable under the standard set forth in *Schweiger v. China Doll*.

14 In determining whether the amount requested in an attorneys’ fees application is  
15 reasonable, courts look to two factors: (1) “reasonable billing rates” and (2) the “hours  
16 reasonably expended.” *Schweiger v. China Doll Rest., Inc.*, 138 Ariz. 183, 187–88 (App.  
17 1983). The billing rates and hours expended in this matter are more than reasonable.

18 First, support for the hourly rates charged to the Association in this matter and the  
19 number of hours spent in defending the Association are included in the Stine Declaration  
20 (Exhibit A) and Ekmark Declaration (Exhibit B) and supported by the itemized fee reports  
21 attached thereto. Those Declarations show that the rates charged are in line with the Phoenix  
22 legal market and reasonable. *See Schweiger*, 138 Ariz. at 187-88 (“the rate charged by the  
23 lawyer to the client is the best indication of what is reasonable under the circumstances of  
24 the particular case”).

25 Second, this matter has been pending since January 22, 2025. Since that date,  
26 Plaintiff filed two iterations of his complaint, the PI Application, and OSC Application.  
27 Plaintiff sought preliminary injunctive relief covering a wide range of issues. The  
28 Association prepared, briefed, and argued a Motion to Dismiss. The Association prepared

1 and briefed a response to the OSC Application and presented argument at a conference on  
2 the same. The Association also prepared and briefed a detailed and fulsome response to  
3 Plaintiff's PI Application, and prepared for and attended an evidentiary hearing on the PI  
4 Application where multiple witnesses and exhibits were contemplated, including an  
5 extensive number of petitions which Plaintiff challenged. As demonstrated in the Stine  
6 Declaration and Ekmark Declaration, the time spent on these tasks was reasonable under  
7 the circumstances.

8 **V. THE ASSOCIATION IS ENTITLED TO ITS TAXABLE COSTS.**

9 The Association is also entitled to an award of its taxable costs under Section 15.9  
10 of the CC&Rs ("the party prevailing . . . shall be entitled to recover . . . attorneys' fees **and**  
11 **costs**, including administrative and lien fees"); A.R.S. § 33-1813(A)(4)(f) ("the prevailing  
12 party . . . shall be awarded its reasonable attorney fees **and costs**"); and A.R.S. § 12-341  
13 ("[t]he successful party to a civil action shall recover from his adversary **all costs** expended  
14 or incurred therein unless otherwise provided by law" ) (emphasis added to each). Again,  
15 as described above, the Association is the successful party in this action, and it is therefore  
16 also entitled to its taxable costs, which are delineated in the Quarles & Brady Verified  
17 Statement of Costs attached as **Exhibit C** hereto. *See also* Ex. A, Stine Declaration, ¶¶ 9-  
18 11.

19 **VI. CONCLUSION.**

20 For the foregoing reasons, Defendant respectfully requests that the Court grant an  
21 award of its reasonable attorneys' fees in the amount of \$353,388 and costs and expenses  
22 in the amount of \$355.85, for a total award of \$353,743.85.

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RESPECTFULLY SUBMITTED this 1st day of August, 2025.

QUARLES & BRADY LLP  
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Two North Central Avenue, Suite 600  
Phoenix, AZ 85004-2322

By: /s/ Lauren Elliott Stine  
Lauren Elliott Stine  
Daniel G. Roberts

*Attorneys for Defendant Sun City Grand  
Community Association, Inc.*

**FILED** with the Clerk of the Court this 1st day of August, 2025, and

**COPY** of the foregoing mailed/emailed the 1st day of August, 2025 to:

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/s/ Kim Simmons

# EXHIBIT A

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9           Daniel G. Roberts (#033273)  
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11          *Attorneys for Defendant*

12                                   IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
13                                   IN AND FOR THE COUNTY OF MARICOPA

14          THOMAS J. GUSICH, an individual,  
15                                   Plaintiff,

16                                   v.

17          SUN CITY GRAND COMMUNITY  
18          ASSOCIATION, INC., an Arizona  
19          nonprofit corporation,  
20                                   Defendant.

21                                   NO. CV2025-002634

22                                   **DECLARATION OF LAUREN  
23                                   ELLIOTT STINE IN SUPPORT OF  
24                                   DEFENDANT’S APPLICATION FOR  
25                                   ATTORNEYS’ FEES AND COSTS**

26                                   (Assigned to the Hon. Jennifer Ryan-  
27                                   Touhill)

28           I, Lauren Elliott Stine, hereby declare as follows:

1           1.       My name is Lauren Elliott Stine. I am a partner with the law firm of Quarles  
2           & Brady LLP (“Quarles”). Quarles represents Defendant Sun City Grand Community  
3           Association, Inc. (the “Association”) in the above-captioned action (the “Lawsuit”). I am  
4           the litigation partner with primary responsibility for the supervision and handling of the  
5           Association’s defense in the Lawsuit. I am over eighteen years old and am competent to  
6           testify. I have been substantially involved in this case and have personal knowledge of the  
7           legal services rendered and the matters described herein, except where otherwise noted. I  
8           am submitting this Declaration in support of the Association’s Application for Attorneys’  
9           Fees and Costs (the “Application”).

10          2.       I am a 2006 graduate of the Sandra Day O’Connor College of Law at Arizona  
11          State University. I have been licensed to practice law in Arizona since 2007. I am a partner

1 in the Quarles' Litigation & Dispute Resolution practice group and serve as the national  
2 vice chair of Quarles' Litigation & Dispute Resolution group. I previously served as a law  
3 clerk for the Honorable W. Scott Bales (ret.) of the Arizona Supreme Court. I practice in a  
4 number of areas of litigation, including the types of disputes at issue in the Lawsuit. During  
5 the course of my career as an attorney, I have handled numerous litigation matters and have  
6 learned what constitutes a reasonable hourly rate for legal services in the Phoenix market  
7 and the tasks required to prosecute and defend matters such as the Lawsuit.

8 3. The Association agreed to pay Quarles' charges for the legal services at the  
9 hourly rates set forth in this declaration, and for costs and expenses incurred for the  
10 representation of the Association in the Lawsuit. The hourly rates Quarles charged are  
11 typical rates for litigation matters that Quarles handles and are reasonable for the type and  
12 quality of work performed in the Lawsuit. Exhibit 1 hereto is an itemized statement of  
13 attorneys' fees, paralegal fees, and costs related to the defense of the Lawsuit. The  
14 Association has agreed to pay the charges identified in Exhibit 1.

15 4. My discounted hourly rate for the Lawsuit was \$620.00 per hour. My role in  
16 this matter consisted of determining the overall strategy; reviewing documents and other  
17 evidence; drafting and revising the Association's Response to Plaintiff's Application for an  
18 Order to Show Cause for Temporary Restraining Order to Halt February 24, 2025 Actions  
19 and preparing for and presenting argument at the hearing on such Application; drafting,  
20 reviewing and revising the Association's Motion to Dismiss Plaintiff's First Amended  
21 Complaint (the "Motion to Dismiss") and preparing for and arguing such Motion; drafting,  
22 reviewing and revising the Association's Response to Plaintiff's Application for  
23 Preliminary Injunction and reviewing evidence and preparing for the evidentiary hearing  
24 on such Application, including the examination of multiple witnesses; directing, reviewing  
25 and contributing to work product of the other attorneys involved; and communicating with  
26 the Association and counsel. A description of the tasks and work that I performed in the  
27 Lawsuit is set forth in **Exhibit 1** hereto. The total charges for my work in the Lawsuit as  
28 stated in Exhibit 1 are \$80,910.00.

1           5.       Daniel Roberts is a partner at Quarles and a member of the firm’s Litigation  
2 & Dispute Resolution group. I am informed that Mr. Roberts obtained his J.D. from the  
3 University of Arizona in 2016, and that he was the valedictorian of his graduating class.  
4 Mr. Roberts joined Quarles & Brady in 2016 and has practiced in the firm’s Litigation &  
5 Dispute Resolution group since then. Mr. Roberts had a substantial role in the defense of  
6 the Association in the Lawsuit. Mr. Roberts’ work included working with me on the  
7 Association’s strategy; drafting and revising the Association’s briefing on all motions and  
8 responses filed in this case; legal research; preparing for the Order to Show Cause hearing;  
9 preparing for and appearing at the evidentiary hearing on Plaintiff’s Application for  
10 Preliminary Injunction (“Plaintiff’s Application”); reviewing and analyzing documents and  
11 identifying exhibits for the hearing on Plaintiff’s Application; conferring with and preparing  
12 witnesses for the hearing on Plaintiff’s Application; coordinating and overseeing work  
13 performed by junior attorneys; responding to Plaintiff’s statutory document requests;  
14 drafting and preparing the application and documents filed as part of the Association’s  
15 Application; and other tasks related to assisting me in defending the Association. Mr.  
16 Roberts’ hourly rate for the Lawsuit was \$620.00 per hour. A description of the tasks and  
17 work Mr. Roberts performed in the Lawsuit is set forth in Exhibit 1 hereto. The total  
18 charges for Mr. Roberts’ work in the Lawsuit as stated in Exhibit 1 are \$126,170.00.

19           6.       Jack Contrera is an associate at Quarles & Brady and a member of the firm’s  
20 Litigation & Dispute Resolution group. I have been informed that Mr. Contrera graduated  
21 from the Sandra Day O’Connor College of Law at Arizona State University in 2024. Mr.  
22 Contrera’s hourly billing rate for the Lawsuit was \$455 per hour. Mr. Contrera’s work on  
23 the Lawsuit included legal research for substantive motions, including the Association’s  
24 Motion to Dismiss and Response to Plaintiff’s Application; drafting briefs; evaluating and  
25 analyzing documents produced by Plaintiff and identified as exhibits for the evidentiary  
26 hearing on Plaintiff’s Application; identifying and analyzing exhibits for use by the  
27 Association at such evidentiary hearing; and assisting with the preparation of oral argument  
28 on the Association’s Motion to Dismiss. Mr. Contrera’s work on the case is more fully

1 described in Exhibit 1 to the Application. A description of the tasks and work Mr. Contrera  
2 performed in the Lawsuit is set forth in Exhibit 1 hereto. The total charges for Mr.  
3 Contrera's work in the Lawsuit as stated in Exhibit 1 are \$71,389.50.

4 7. Carla Walters is a paralegal at Quarles & Brady. I have been informed that  
5 Ms. Walters has worked as a litigation and trial paralegal for over 28 years. Ms. Walters'  
6 hourly billing rate in the Lawsuit was \$385 per hour. Ms. Walters' work on this matter  
7 included processing documents; reviewing and analyzing documents for purposes of the  
8 Association's defense at the evidentiary hearing on Plaintiff's Application; organizing and  
9 preparing exhibits for such evidentiary hearing; preparing documents for production in  
10 response to requests made by Plaintiff; preparing for and assisting with hearings; and other  
11 related tasks. A description of the tasks and work Ms. Walters performed in the Lawsuit is  
12 set forth in Exhibit 1 hereto. The total charges for Ms. Walters' work in the Lawsuit as  
13 stated in Exhibit 1 are \$16,670.50.

14 8. The descriptions of work in Exhibit 1 include the date of the task(s), the name  
15 of the person who performed each task, the amount of time expended measured in tenths of  
16 hours, the amount of charges for the time involved, and a brief description of the work  
17 performed.

18 9. Exhibit 1 was generated from individual time sheets completed by the  
19 attorneys who worked on this matter. Consistent with firm practice and policy, the  
20 individuals either fill out time sheets or input their time entries into software. Those time  
21 entries are then placed in Quarles & Brady's accounting computer system, which generates  
22 proformas for billing purposes. Costs are submitted to accounting when they have been  
23 incurred and are included in the billing proformas. Billing statements are created, reflecting  
24 the work performed, the charges for that work, and the costs incurred. Payments are sent  
25 to Quarles & Brady in response to the billing statements. These practices and procedures  
26 are standard at Quarles & Brady and in the Phoenix, Arizona legal market and are within  
27 Quarles & Brady's normal business operations.

28 10. The total amount of legal fees incurred for the defense of the Association in

1 the Lawsuit stated in Exhibit 1 is \$295,140. Attached as Exhibit C to the Application is  
2 Quarles' Verified Statement of Costs. The taxable costs incurred were \$355.85.

3 11. I reviewed the charges for legal services and costs stated in Exhibit 1 hereto.  
4 The hourly rates charged by Quarles to the Association are reasonable. The work performed  
5 by the legal personnel at Quarles on behalf of the Association, as described in Exhibit 1,  
6 was justified and reasonable under the circumstances of the Lawsuit. In that regard, the  
7 charges shown in Exhibit 1 are reasonable, based upon the issues in this action, the quality  
8 of the legal services provided by Quarles, the caliber and qualifications of the attorneys  
9 performing the legal work for the Association, the character and difficulty of the work to  
10 be done, and the results obtained for the Association.

11 12. I estimate that an additional \$10,000 in attorneys' fees will be incurred for  
12 additional preparation and the filing of this Application and accompanying documents,  
13 along with its review of any response and submission of a reply in support thereof.

14 I declare under penalty of perjury of the laws of the State of Arizona that the  
15 foregoing is true and correct.

16 EXECUTED this 1st day of August, 2025.

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20 Lauren E. Stine  
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# EXHIBIT 1



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**SUMMARY OF FEES BY PERSON**

<b><u>ATTORNEY/PARALEGAL</u></b>	<b><u>TITLE</u></b>	<b><u>HOURS</u></b>	<b><u>RATE/HR</u></b>	<b><u>DOLLARS</u></b>
Contrera, Jack H.	Associate	156.9	\$455.00	\$71,389.50
Roberts, Daniel G.	Partner	203.5	\$620.00	\$126,170.00
Stine, Lauren E.	Partner	130.5	\$620.00	\$80,910.00
Walters, Carla S.	Paralegal/Legal Specialist	43.3	\$385.00	\$16,670.50
<b>TOTAL:</b>		<b>534.20</b>		<b>\$295,140.00</b>

**ITEMIZED CHRONOLOGY OF FEES**

<b>Date</b>	<b>ATTY/PARA.</b>	<b>Title</b>	<b>Hours</b>	<b>Amount</b>	<b>Description</b>
02/13/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Review email communication from counsel for Gusich related to status of matter.
02/13/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Review complaint.
02/13/25	Stine, Lauren E.	Partner	0.10	\$62.00	Attention to response to complaint.
02/13/25	Stine, Lauren E.	Partner	0.40	\$248.00	Communications with counsel re: request for extension and related follow up.
02/14/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications re: extension and response to complaint.
02/17/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review Arizona law related to recall.
02/17/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Strategize regarding next steps.
02/17/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Review communications with counsel for Gusich.
02/17/25	Stine, Lauren E.	Partner	0.20	\$124.00	Finalize and send email to counsel re: request for extension.
02/18/25	Stine, Lauren E.	Partner	0.10	\$62.00	Review counsel communication re: forthcoming amended complaint.
02/20/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Coordinate with C. Walters regarding ingestion of client documents.
02/20/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Draft and revise notice of appearance.
02/20/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Coordinate legal research of issues with defense team.
02/20/25	Roberts, Daniel G.	Partner	5.80	\$3,596.00	Draft summary of arguments for defenses to temporary restraining order (3.0); review pleadings and client documents (.8); and perform legal research in connection with same (2.0).
02/20/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Confer internally regarding strategy and defenses.
02/20/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Participate in conference call with L. Stine and client representatives.
02/20/25	Stine, Lauren E.	Partner	4.00	\$2,480.00	Begin review of amended complaint and TRO application (2.0) and multiple conferences with client and C. Ekmark re: same (2.0).
02/21/25	Contrera, Jack H.	Associate	0.40	\$182.00	Combine findings into memorandum with analysis and share with legal team.
02/21/25	Contrera, Jack H.	Associate	0.50	\$227.50	Conduct additional research expanding into other jurisdictions.
02/21/25	Contrera, Jack H.	Associate	1.60	\$728.00	Conduct research into [REDACTED] issues related to defenses.
02/21/25	Contrera, Jack H.	Associate	2.20	\$1,001.00	Conduct legal research on [REDACTED] related to defenses.
02/21/25	Roberts, Daniel G.	Partner	2.20	\$1,364.00	Continue drafting arguments related to opposition and defense of temporary

					restraining order and motion for preliminary injunction.
02/21/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Review legal research related to defenses.
02/21/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer internally with L. Stine regarding strategy for matter.
02/21/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Review docket for updates in schedule.
02/21/25	Roberts, Daniel G.	Partner	1.20	\$744.00	Review client documents.
02/21/25	Stine, Lauren E.	Partner	0.40	\$248.00	Multiple communications regarding issue of [REDACTED].
02/21/25	Stine, Lauren E.	Partner	0.80	\$496.00	Evaluate legal research for response to temporary restraining order application.
02/21/25	Stine, Lauren E.	Partner	3.00	\$1,860.00	Continue to evaluate temporary restraining order application and work on response to same.
02/22/25	Stine, Lauren E.	Partner	0.20	\$124.00	Communications with C. Ekmark re: [REDACTED] and review dockets related to same.
02/24/25	Roberts, Daniel G.	Partner	1.40	\$868.00	Begin drafting response in opposition to motion for order to show cause.
02/24/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer internally regarding status of matter and strategy.
02/24/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Review and analyze client documents.
02/25/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Continue drafting response to motion for order to show cause for temporary restraining order.
02/25/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Strategize with L. Stine regarding matter and next steps.
02/25/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Review documents served by counsel for Plaintiff and compare to prior pleadings.
02/25/25	Stine, Lauren E.	Partner	0.40	\$248.00	Review order to show cause and related follow up communications.
02/26/25	Stine, Lauren E.	Partner	0.10	\$62.00	Call and message to counsel regarding order to show cause hearing.
02/26/25	Stine, Lauren E.	Partner	0.10	\$62.00	Communications with C. Ekmark regarding [REDACTED]
02/27/25	Stine, Lauren E.	Partner	0.50	\$310.00	Call with counsel regarding order to show cause hearing and related follow up call with C. Ekmark.
03/03/25	Stine, Lauren E.	Partner	0.10	\$62.00	Communication with J. Hochman regarding [REDACTED].
03/04/25	Stine, Lauren E.	Partner	0.60	\$372.00	Evaluate and work on response to request for order to show cause.
03/05/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Review client documents related to recall petition.
03/05/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Review communications from opposing counsel.
03/05/25	Roberts, Daniel G.	Partner	3.80	\$2,356.00	Draft response to Plaintiff's application for order to show cause (2.8); review pleadings

					and client documents in connection with same (1.0).
03/05/25	Stine, Lauren E.	Partner	0.10	\$62.00	Review proposal from Plaintiff regarding hearing.
03/05/25	Stine, Lauren E.	Partner	1.40	\$868.00	Revise response to application for order to show cause.
03/06/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Coordinate audit of recall petition documents.
03/06/25	Roberts, Daniel G.	Partner	1.30	\$806.00	Review and revise draft response to application for order to show cause.
03/06/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with counsel regarding document request and order to show cause hearing.
03/06/25	Stine, Lauren E.	Partner	3.30	\$2,046.00	Revise response to application for order to show cause, finalize same for filing (2.5), and multiple communications with C. Ekmark and J. Hochman regarding [REDACTED] (.8).
03/07/25	Contrera, Jack H.	Associate	1.80	\$819.00	Begin drafting motion to dismiss.
03/07/25	Contrera, Jack H.	Associate	0.40	\$182.00	Participate in internal strategy meeting regarding background and drafting motion to dismiss.
03/07/25	Roberts, Daniel G.	Partner	0.60	\$372.00	Review case file and important correspondence and documents.
03/07/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Review client communications.
03/07/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Coordinate document review.
03/07/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer internally regarding drafting of motion to dismiss.
03/07/25	Roberts, Daniel G.	Partner	1.10	\$682.00	Prepare for and appear at order to show cause return hearing.
03/07/25	Stine, Lauren E.	Partner	2.00	\$1,240.00	Prepare for and participate in order to show cause return hearing (1.1) and follow up communications with C. Ekmark and J. Hochman.
03/07/25	Walters, Carla S.	Paralegal/Legal Specialist	2.60	\$1,001.00	Begin work on confirming signatures in favor of petition.
03/09/25	Contrera, Jack H.	Associate	2.90	\$1,319.50	Review of case history, complaint, and temporary restraining order pleadings (1.5); conduct legal research related to defenses [REDACTED]
03/10/25	Contrera, Jack H.	Associate	0.90	\$409.50	Internal meeting with legal team discussing motion strategy and potential arguments.
03/10/25	Contrera, Jack H.	Associate	4.20	\$1,911.00	Draft motion to dismiss.
03/10/25	Walters, Carla S.	Paralegal/Legal Specialist	2.20	\$847.00	Continue work on analyzing recall petition signatures.
03/11/25	Contrera, Jack H.	Associate	3.30	\$1,501.50	Continue to draft motion to dismiss.
03/11/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer with internally J. Contrera regarding draft motion to dismiss and [REDACTED].
03/11/25	Walters, Carla S.	Paralegal/Legal Specialist	3.70	\$1,424.50	Continue work on analyzing petition signatures.

03/12/25	Contrera, Jack H.	Associate	1.30	\$591.50	Finalize motion to dismiss, conduct proofread and citation check, circulate with legal team.
03/12/25	Walters, Carla S.	Paralegal/Legal Specialist	2.80	\$1,078.00	Continue work on analyzing recall petition signatures.
03/13/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer internally regarding [REDACTED]of petition documents.
03/13/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Coordinate preparation of client documents for production in response to statutory request made by Plaintiff.
03/13/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Review client documents for potential production.
03/13/25	Stine, Lauren E.	Partner	0.40	\$248.00	Follow up and work regarding document production set.
03/13/25	Walters, Carla S.	Paralegal/Legal Specialist	3.40	\$1,309.00	Continue work on analyzing votes received.
03/15/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer internally with L. Stine regarding response to request for production from Plaintiff.
03/15/25	Stine, Lauren E.	Partner	0.20	\$124.00	Communications with D. Roberts re: production.
03/17/25	Roberts, Daniel G.	Partner	0.90	\$558.00	Perform quality control review of documents prepared for production in response to statutory request and confer internally with L. Stine regarding [REDACTED] and related issues.
03/17/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via email with client regarding matter document production.
03/17/25	Roberts, Daniel G.	Partner	0.60	\$372.00	Review and revise draft motion to dismiss.
03/17/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review statute governing document requests from associations and confer internally with L. Stine regarding same.
03/17/25	Stine, Lauren E.	Partner	0.90	\$558.00	Work and communications regarding production set.
03/17/25	Walters, Carla S.	Paralegal/Legal Specialist	3.40	\$1,309.00	Organize and bates label documents in connection with response to Plaintiffs' counsel's document request letter.
03/18/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Coordinate document production with C. Walters.
03/18/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via email with opposing counsel regarding missing verification form for first amended complaint.
03/18/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via telephone with client regarding document production pursuant to plaintiff's statutory request.
03/18/25	Roberts, Daniel G.	Partner	4.30	\$2,666.00	Draft and revise motion to dismiss first amended complaint and perform legal research related to same.
03/18/25	Stine, Lauren E.	Partner	0.10	\$62.00	Email with counsel regarding verification filing.

03/18/25	Stine, Lauren E.	Partner	0.40	\$248.00	Attend to and work on client document production.
03/19/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Review and revise draft document production cover letter.
03/19/25	Roberts, Daniel G.	Partner	1.20	\$744.00	Continue drafting and revising motion to dismiss and perform additional research related to same.
03/19/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review updated document production set.
03/19/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with client regarding proposed document production.
03/19/25	Stine, Lauren E.	Partner	0.40	\$248.00	Revise production letter and attention to production set.
03/19/25	Walters, Carla S.	Paralegal/Legal Specialist	1.40	\$539.00	Revise production of client documents (1.1); draft letter responding to Wood's letter (.3).
03/20/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Coordinate production of documents to Plaintiff's counsel.
03/20/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer via telephone and email with client regarding production of documents.
03/20/25	Roberts, Daniel G.	Partner	1.50	\$930.00	Continue drafting and revising motion to dismiss.
03/20/25	Stine, Lauren E.	Partner	0.80	\$496.00	Work related to document production.
03/20/25	Stine, Lauren E.	Partner	0.20	\$124.00	Communications with C. Ekmark client regarding discussions with opposing counsel and related follow up.
03/20/25	Walters, Carla S.	Paralegal/Legal Specialist	1.60	\$616.00	Archive 'truthatgrand.com' website.
03/24/25	Roberts, Daniel G.	Partner	3.80	\$2,356.00	Continue drafting and revising motion to dismiss.
03/25/25	Roberts, Daniel G.	Partner	2.50	\$1,550.00	Continue drafting and revising motion to dismiss and perform additional legal research related to same.
03/25/25	Walters, Carla S.	Paralegal/Legal Specialist	2.70	\$1,039.50	Continue audit and analysis of petition documents.
03/26/25	Walters, Carla S.	Paralegal/Legal Specialist	1.40	\$539.00	Continue audit and analysis of petitions documents.
03/27/25	Contrera, Jack H.	Associate	0.50	\$227.50	Review of revised motion to dismiss and correspondence concerning proposed revisions.
03/27/25	Roberts, Daniel G.	Partner	0.60	\$372.00	Perform additional legal research related to defenses raised in motion to dismiss.
03/27/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review and revise draft motion to dismiss.
03/27/25	Stine, Lauren E.	Partner	1.00	\$620.00	Work on revisions to motion to dismiss.
03/28/25	Contrera, Jack H.	Associate	2.00	\$910.00	Conduct legal research related to [REDACTED].
03/28/25	Contrera, Jack H.	Associate	0.10	\$45.50	Confer internally regarding findings of legal research.
03/28/25	Contrera, Jack H.	Associate	0.30	\$136.50	Confer internally regarding edits and research related to drafting motion to dismiss.

03/28/25	Contrera, Jack H.	Associate	0.70	\$318.50	Revise and draft motion to dismiss.
03/28/25	Contrera, Jack H.	Associate	1.10	\$500.50	Research case law and proceedings on HOA director removals.
03/28/25	Roberts, Daniel G.	Partner	3.00	\$1,860.00	Confer internally with J. Contrera regarding revisions to draft motion to dismiss.
03/28/25	Stine, Lauren E.	Partner	0.70	\$434.00	Work on motion to dismiss research and related communications.
03/29/25	Contrera, Jack H.	Associate	3.40	\$1,547.00	Draft motion to dismiss.
03/30/25	Contrera, Jack H.	Associate	0.70	\$318.50	Proofread and review motion to dismiss.
03/31/25	Contrera, Jack H.	Associate	0.30	\$136.50	Confer internally regarding draft language to include in motion to dismiss.
03/31/25	Contrera, Jack H.	Associate	0.20	\$91.00	Review partner revisions to motion to dismiss.
03/31/25	Contrera, Jack H.	Associate	1.10	\$500.50	Review of governing documents related to claim for attorney's fees.
03/31/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Research law governing [REDACTED].
03/31/25	Roberts, Daniel G.	Partner	2.30	\$1,426.00	Revise draft motion to dismiss.
03/31/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with J. Hochman and C. Ekmark regarding hearing.
04/01/25	Roberts, Daniel G.	Partner	1.50	\$930.00	Review and revise draft motion to dismiss.
04/01/25	Stine, Lauren E.	Partner	1.50	\$930.00	Revise motion to dismiss (1.1); communications with client regarding same (.4).
04/02/25	Stine, Lauren E.	Partner	0.70	\$434.00	Meet and confer with counsel regarding motion to dismiss and related follow up.
04/02/25	Stine, Lauren E.	Partner	0.30	\$186.00	Work regarding motion to dismiss.
04/03/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with Ekmark firm regarding [REDACTED].
04/03/25	Stine, Lauren E.	Partner	1.00	\$620.00	Communications with C. Ekmark re: motion to dismiss and revise same.
04/04/25	Roberts, Daniel G.	Partner	1.50	\$930.00	Revise draft motion to dismiss (.6); draft declaration in support of motion to dismiss (.6); confer internally with L. Stine regarding motion to dismiss and strategy (.3).
04/04/25	Stine, Lauren E.	Partner	1.00	\$620.00	Continue to work on motion to dismiss and supporting declaration.
04/07/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer via email with client regarding draft motion to dismiss and draft declaration in support of the motion.
04/07/25	Roberts, Daniel G.	Partner	1.00	\$620.00	Review and revise draft motion to dismiss and declaration in support of motion to dismiss.
04/07/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Confer internally L. Stine regarding work on motion to dismiss and supporting documents and communications with client.
04/07/25	Stine, Lauren E.	Partner	1.10	\$682.00	Work on motion to dismiss declaration and related communications with clients.
04/08/25	Contrera, Jack H.	Associate	2.10	\$955.50	Review of motion to dismiss and supporting materials.

04/08/25	Contrera, Jack H.	Associate	0.50	\$227.50	Meeting with legal team regarding next steps in preparing for discovery, upcoming hearing, and response to application for preliminary injunction.
04/08/25	Contrera, Jack H.	Associate	2.10	\$955.50	Prepare and finalize documents for filing.
04/08/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer via email with client regarding revisions to declaration in support of motion to dismiss.
04/08/25	Roberts, Daniel G.	Partner	0.90	\$558.00	Review and revise draft motion to dismiss, certificate of good faith consultation, and supporting declaration.
04/08/25	Roberts, Daniel G.	Partner	1.00	\$620.00	Confer internally with L. Stine and J. Contrera via team meeting and via email regarding: strategy; updating draft motion to dismiss, discovery; and response to application for preliminary injunction.
04/08/25	Stine, Lauren E.	Partner	1.40	\$868.00	Work on motion to dismiss and final edits to same.
04/08/25	Stine, Lauren E.	Partner	0.50	\$310.00	Participate in strategy meeting regarding preliminary injunction hearing.
04/09/25	Contrera, Jack H.	Associate	1.80	\$819.00	Proof, finalize, and coordinate filing of motion to dismiss.
04/09/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer via telephone with client and client's counsel regarding motion to dismiss and [REDACTED].
04/09/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Review and revise draft motion to dismiss and update citations.
04/09/25	Stine, Lauren E.	Partner	0.20	\$124.00	Communications regarding exhibits to complaint and meeting minutes.
04/09/25	Stine, Lauren E.	Partner	0.80	\$496.00	Work on finalizing motion to dismiss for filing and related communications.
04/10/25	Contrera, Jack H.	Associate	0.60	\$273.00	Review of discovery materials and prepare written discovery requests.
04/11/25	Contrera, Jack H.	Associate	0.60	\$273.00	Begin to draft requests for admission.
04/12/25	Contrera, Jack H.	Associate	0.80	\$364.00	Draft and revise requests for admission and non-uniform interrogatories.
04/13/25	Contrera, Jack H.	Associate	1.60	\$728.00	Draft non-uniform interrogatories and requests for production.
04/13/25	Stine, Lauren E.	Partner	0.20	\$124.00	Communications with C. Ekmark regarding witness [REDACTED].
04/14/25	Contrera, Jack H.	Associate	0.20	\$91.00	Confer internally regarding strategy and updates to draft discovery.
04/14/25	Contrera, Jack H.	Associate	0.20	\$91.00	Confer internally to discuss drafting preliminary injunction application response.
04/14/25	Contrera, Jack H.	Associate	0.40	\$182.00	Begin drafting preliminary injunction application response.
04/14/25	Contrera, Jack H.	Associate	1.60	\$728.00	Work on draft written discovery materials (1.3) and confer internally regarding same (.3).

04/14/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer internally with L. Stine regarding strategy and arguments in response to application for preliminary injunction.
04/14/25	Roberts, Daniel G.	Partner	1.30	\$806.00	Review and revise draft written discovery.
04/14/25	Stine, Lauren E.	Partner	0.50	\$310.00	Review and analyze evidentiary support for application for preliminary injunction.
04/14/25	Stine, Lauren E.	Partner	0.80	\$496.00	Evaluate arguments for response to preliminary injunction application.
04/14/25	Stine, Lauren E.	Partner	0.40	\$248.00	Confer with Jeff Hochman re: petition factual background and related follow up.
04/15/25	Contrera, Jack H.	Associate	0.70	\$318.50	Read and review Plaintiff's application for preliminary injunction and develop and assess arguments in response to allegations and claims.
04/15/25	Contrera, Jack H.	Associate	0.20	\$91.00	Confer internally to discuss motion briefing strategy.
04/15/25	Contrera, Jack H.	Associate	2.00	\$910.00	Draft introduction and factual background sections of response to application for preliminary injunction.
04/15/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Confer internally regarding strategy on response to application for preliminary injunction.
04/15/25	Stine, Lauren E.	Partner	0.40	\$248.00	Evaluate recall petition analysis from Ekmark firm.
04/15/25	Stine, Lauren E.	Partner	0.30	\$186.00	Strategy call with Ekmark firm recall petition analysis.
04/15/25	Stine, Lauren E.	Partner	1.00	\$620.00	Continue to work on preliminary injunction hearing and response strategy.
04/16/25	Contrera, Jack H.	Associate	5.30	\$2,411.50	Draft legal argument sections of response to application for preliminary injunction Application.
04/17/25	Contrera, Jack H.	Associate	0.80	\$364.00	Draft and revise response to application for preliminary injunction.
04/17/25	Contrera, Jack H.	Associate	2.00	\$910.00	Confer internally regarding response to application for preliminary injunction.
04/18/25	Contrera, Jack H.	Associate	0.50	\$227.50	Revise factual background section of response to application for preliminary injunction.
04/21/25	Contrera, Jack H.	Associate	0.30	\$136.50	Revise response to application for preliminary injunction.
04/23/25	Stine, Lauren E.	Partner	0.20	\$124.00	Review notice regarding extension of time to file responsive pleading and related communications with client.
04/24/25	Contrera, Jack H.	Associate	0.20	\$91.00	Confer internally regarding case strategy and discussion regarding revision to response to application for preliminary injunction.
04/25/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Review and analyze Plaintiffs' response to motion to dismiss.

04/25/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with C. Ekmark regarding matter.
04/28/25	Contrera, Jack H.	Associate	2.00	\$910.00	Continue drafting and revising response to application for preliminary injunction (1.9); confer internally regarding same (.1).
04/28/25	Contrera, Jack H.	Associate	0.60	\$273.00	Confer internally to discuss case and next steps.
04/28/25	Stine, Lauren E.	Partner	0.70	\$434.00	Strategy discussions with team regarding reply in support of motion to dismiss and response to application for preliminary injunction.
04/29/25	Contrera, Jack H.	Associate	0.20	\$91.00	Confer internally regarding updated response to application for preliminary injunction (.1); review materials to begin drafting reply in support of motion to dismiss (.1).
04/30/25	Contrera, Jack H.	Associate	1.70	\$773.50	Review and analyze Plaintiffs' response to motion to dismiss and begin drafting reply brief.
04/30/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Review and revise draft response to application for preliminary injunction.
04/30/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Review and analyze Plaintiff's response to motion to dismiss.
04/30/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Strategize regarding reply in support of motion to dismiss and response to application for preliminary injunction.
04/30/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Participate in conference call with C. Ekmark regarding filings.
04/30/25	Stine, Lauren E.	Partner	1.10	\$682.00	Evaluate legal research issues and additional arguments.
04/30/25	Stine, Lauren E.	Partner	0.70	\$434.00	Prepare for and participate in strategy call with C. Ekmark regarding reply in support of motion to dismiss and related follow up.
05/01/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Review statutory document request issued by Plaintiff through counsel, compare with prior similar request, and review client documents related to same.
05/01/25	Stine, Lauren E.	Partner	0.30	\$186.00	Review letter from counsel regarding client document production.
05/02/25	Contrera, Jack H.	Associate	3.10	\$1,410.50	Continue drafting reply in support of motion to dismiss.
05/02/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with counsel Ekmark regarding supplemental document request sent by Plaintiff.
05/02/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Attempt to confer via telephone with fact witnesses.
05/02/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Work regarding Plaintiff's documents request and potential response.
05/04/25	Contrera, Jack H.	Associate	1.60	\$728.00	Draft introduction and fact section of reply in support of motion to dismiss.

05/05/25	Contrera, Jack H.	Associate	4.30	\$1,956.50	Draft legal arguments in reply in support of motion to dismiss concerning applicability of nonprofit statutes, indemnity, and recall election.
05/05/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via telephone with third-party witness.
05/05/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via email with client and client counsel to schedule conference call.
05/05/25	Roberts, Daniel G.	Partner	4.90	\$3,038.00	Review and revise draft legal sections of reply in support of motion to dismiss and perform additional legal research related to same.
05/05/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Review client documents and coordinate preparation of additional documents to be produced to Plaintiff in connection with supplemental statutory document request.
05/05/25	Roberts, Daniel G.	Partner	0.90	\$558.00	Prepare for and participate in teleconference call with Ekmark firm regarding Plaintiff's document requests, evidence to be used in support of defenses to the application for injunctive relief, and strategy generally.
05/05/25	Stine, Lauren E.	Partner	1.40	\$868.00	Evaluate arguments, evidence and witnesses for preliminary injunction hearing.
05/05/25	Stine, Lauren E.	Partner	0.50	\$310.00	Prepare for and participate in call with C.Ekmark latest document demand and injunction preparation.
05/06/25	Contrera, Jack H.	Associate	1.30	\$591.50	Conduct legal research regarding [REDACTED] related to defenses raised in motion briefing and summarize same.
05/06/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Strategize regarding response to supplemental statutory document request issued by Plaintiff.
05/06/25	Roberts, Daniel G.	Partner	3.30	\$2,046.00	Continue drafting and revising reply in support of motion to dismiss.
05/06/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Strategize regarding arguments in reply in support of motion to dismiss and in response to application for preliminary injunction.
05/06/25	Roberts, Daniel G.	Partner	2.40	\$1,488.00	Perform legal research related to defense against indemnity claim in connection with reply in support of motion to dismiss.
05/06/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Prepare for and participate in conference call with client and client's outside general counsel regarding matter, including responses to statutory document requests and defenses.
05/06/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Prepare for and participate in video conference all with client witness.
05/06/25	Stine, Lauren E.	Partner	1.60	\$992.00	Work on revisions to fact and background sections of reply in support of motion to dismiss.
05/06/25	Stine, Lauren E.	Partner	1.20	\$744.00	Evaluate legal research for reply in support of motion to dismiss.

05/06/25	Stine, Lauren E.	Partner	1.00	\$620.00	Participate in strategy call with C. Ekmark and J. Hochman client and client's outside general counsel and related follow up.
05/06/25	Stine, Lauren E.	Partner	0.90	\$558.00	Participate in witness interview and related follow up.
05/07/25	Contrera, Jack H.	Associate	0.30	\$136.50	Provide analysis case law related to issues in hearing on application for preliminary injunction.
05/07/25	Contrera, Jack H.	Associate	1.60	\$728.00	Proofread and revise draft reply in support of motion to dismiss.
05/07/25	Contrera, Jack H.	Associate	2.00	\$910.00	Conduct expanded research into other jurisdictions and case law relate to issues of indemnification and third-party claims.
05/07/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via conference call with client's outside general counsel regarding draft reply in support of motion to dismiss.
05/07/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Coordinate and review expanded research related to defenses.
05/07/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Confer via email with client and C.Ekmark regarding draft reply in support of motion to dismiss and gathering of additional documents in response to plaintiff's statutory request for documents.
05/07/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Draft notice of extension of time to file reply.
05/07/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Review additional documents received from client and third-party witness.
05/07/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Review research related to defense against indemnity claim in connection with reply in support of motion to dismiss and perform expanded research related to same.
05/07/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Draft and revise letter responding to supplemental statutory document request issued by Plaintiff.
05/07/25	Roberts, Daniel G.	Partner	2.30	\$1,426.00	Review and revise draft reply in support of motion to dismiss.
05/07/25	Stine, Lauren E.	Partner	0.50	\$310.00	Review and revise letter regarding records request and related communications.
05/07/25	Stine, Lauren E.	Partner	0.10	\$62.00	Review extension papers.
05/07/25	Stine, Lauren E.	Partner	0.50	\$310.00	Review client documents, including voting lists and instructions for hearing.
05/07/25	Stine, Lauren E.	Partner	0.40	\$248.00	Participate in strategy call with D. Roberts and C. Ekmark and implement additional edits to reply in support of motion to dismiss.
05/07/25	Stine, Lauren E.	Partner	3.00	\$1,860.00	Review and revise introduction, fact, and legal sections of reply in support of motion to dismiss and evaluate expanded case law and statutory arguments.
05/08/25	Contrera, Jack H.	Associate	2.60	\$1,183.00	Conduct final proofread and cite check of reply in support of motion to dismiss, and

					circulate finalized draft for approval of filing same.
05/08/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer via email and telephone with client's outside general counsel regarding draft reply in support of motion to dismiss.
05/08/25	Roberts, Daniel G.	Partner	2.40	\$1,488.00	Implement final revisions to draft reply in support of motion to dismiss and finalize same for filing.
05/08/25	Stine, Lauren E.	Partner	2.20	\$1,364.00	Work on final edits to reply in support of motion to dismiss.
05/08/25	Stine, Lauren E.	Partner	0.80	\$496.00	Evaluate client documents and evidence for hearing and related communications.
05/08/25	Walters, Carla S.	Paralegal/Legal Specialist	0.50	\$192.50	Download and organize additional client documents for access and review by team.
05/12/25	Contrera, Jack H.	Associate	1.90	\$864.50	Conduct legal research and provide updated case law and analysis on the applicable standard for preliminary injunctions.
05/12/25	Contrera, Jack H.	Associate	1.30	\$591.50	Review and prepare exhibits for same.
05/12/25	Contrera, Jack H.	Associate	1.80	\$819.00	Draft declarations for preliminary injunction production.
05/12/25	Roberts, Daniel G.	Partner	9.50	\$5,890.00	Draft response in opposition to application for preliminary injunction.
05/12/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Evaluate additional research needed related to response in opposition to application for preliminary injunction.
05/12/25	Stine, Lauren E.	Partner	0.50	\$310.00	Evaluate exhibit and witness list for PI hearing.
05/13/25	Contrera, Jack H.	Associate	1.60	\$728.00	Conduct legal research regarding [REDACTED].
05/13/25	Contrera, Jack H.	Associate	0.60	\$273.00	Continue legal research into issues raised in response to application for preliminary injunction.
05/13/25	Roberts, Daniel G.	Partner	0.60	\$372.00	Assemble and prepare documents for response in opposition to Plaintiff's application for preliminary injunction.
05/13/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Strategize regarding revisions to draft response to application for preliminary injunction.
05/13/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Coordinate additional research related to defenses in response to application for preliminary injunction and review findings of research.
05/13/25	Roberts, Daniel G.	Partner	4.30	\$2,666.00	Continue drafting response to application for preliminary injunction and supporting declarations.
05/13/25	Stine, Lauren E.	Partner	3.50	\$2,170.00	Review and revise substantive response to application for preliminary injunction.
05/14/25	Roberts, Daniel G.	Partner	2.30	\$1,426.00	Continue to draft and revise factual sections of response to application for preliminary injunction and supporting declarations.

05/14/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Work on witness and exhibits lists for hearing on preliminary injunction.
05/14/25	Roberts, Daniel G.	Partner	0.90	\$558.00	Review and prepare documents for review in response to Plaintiff's statutory request for client documents.
05/14/25	Roberts, Daniel G.	Partner	0.60	\$372.00	Draft supplemental response letter to opposing counsel regarding documents available for inspection pursuant to Plaintiff's statutory request.
05/14/25	Stine, Lauren E.	Partner	0.80	\$496.00	Strategize regarding exhibits and witness list.
05/14/25	Stine, Lauren E.	Partner	0.40	\$248.00	Review and revise draft letter response to records request and related communications.
05/14/25	Stine, Lauren E.	Partner	5.20	\$3,224.00	Continue to draft and revise legal sections of response to application for preliminary injunction (4.1); draft and revise declarations for response to preliminary injunction (1.1).
05/14/25	Walters, Carla S.	Paralegal/Legal Specialist	1.30	\$500.50	Draft notice of filing of witness and exhibit list in connection with evidentiary hearing (.5) and access & familiarize self with CaseLines in preparation for hearing (.8).
05/15/25	Contrera, Jack H.	Associate	9.40	\$4,277.00	Analyze petition signature documents and create related exhibits for evidentiary hearing on application for preliminary injunction.
05/15/25	Roberts, Daniel G.	Partner	1.80	\$1,116.00	Organize exhibits for hearing on application for preliminary injunction (.8); prepare documents available for review by Plaintiff pursuant to statutory request (1.0).
05/15/25	Roberts, Daniel G.	Partner	3.60	\$2,232.00	Review and revise draft response to application for preliminary injunction.
05/15/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Coordinate preparation of new petition signature exhibit for hearing on application for preliminary injunction.
05/15/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Revise and finalize letter to opposing counsel regarding documents available for review.
05/15/25	Roberts, Daniel G.	Partner	0.90	\$558.00	Confer via email and telephone with client and C.Ekmark regarding matter, including evidence for response to application for preliminary injunction and hearing for the same.
05/15/25	Roberts, Daniel G.	Partner	0.90	\$558.00	Strategize regarding preparation for hearing on Plaintiff's application for preliminary injunction, response to application, and other issues.
05/15/25	Roberts, Daniel G.	Partner	1.10	\$682.00	Draft and revise list of witnesses and exhibits for hearing on application for preliminary injunction.
05/15/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with counsel regarding list exchange and extension.
05/15/25	Stine, Lauren E.	Partner	0.20	\$124.00	Review proposed stipulation and order and related email with counsel.

05/15/25	Stine, Lauren E.	Partner	0.60	\$372.00	Finalize letter regarding response to records request and related communications with counsel.
05/15/25	Stine, Lauren E.	Partner	4.90	\$3,038.00	Work on witness and exhibit list (.9); continue to work on response to preliminary injunction application and supporting declarations and evidence (4.0).
05/15/25	Walters, Carla S.	Paralegal/Legal Specialist	2.70	\$1,039.50	Work on organizing exhibits in preparation for hearing (2.4); upload submission to CaseLines, create binders of same (.3).
05/16/25	Contrera, Jack H.	Associate	6.20	\$2,821.00	Continue reviewing and analyzing all petition signatures, review paper ballots used in removal vote, and compare to signatures from petition, and prepare related exhibits for preliminary injunction hearing (5.2); begin process of providing an exact count of signatures in support of petition (1.0).
05/16/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review Plaintiff's list of witnesses and exhibits and confer with client and client's outside general counsel regarding same.
05/16/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via telephone with opposing counsel regarding protected status of exhibits containing personal information of association members and possible stipulation to seal.
05/16/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Coordinate filing of witness and exhibit list.
05/16/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer internally with J. Contrera regarding preparation of additional petition exhibit.
05/16/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Confer via email and telephone with the client and C.Ekmark regarding draft witness and exhibit list for hearing on application for preliminary injunction and draft response to application.
05/16/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Review and revise draft list of witnesses and exhibits and coordinate preparation of exhibits for submission to the court and exchange with opposing counsel.
05/16/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Draft declaration of custodian of records for witness J. Claiborne of Vote-Now.com.
05/16/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer via email and telephone with fact witness J. Claiborne of Vote-Now.com.
05/16/25	Roberts, Daniel G.	Partner	1.90	\$1,178.00	Review and revise draft response in opposition to application for preliminary injunction and supporting declarations.
05/16/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Meet in office with opposing counsel to facilitate inspection and production of documents in response to Plaintiff's statutory request.
05/16/25	Roberts, Daniel G.	Partner	1.00	\$620.00	Strategize regarding preparation for hearing on Plaintiff's application for preliminary injunction, response to application, and other issues.

05/16/25	Stine, Lauren E.	Partner	0.90	\$558.00	Evaluate Plaintiff's witness and exhibit list and related communications (.6); review and evaluate plaintiff's bench memorandum (.3).
05/16/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communicate with counsel and team regarding request for document inspection.
05/16/25	Stine, Lauren E.	Partner	0.40	\$248.00	Review and analyze petition signature exhibit and related communications.
05/16/25	Stine, Lauren E.	Partner	1.90	\$1,178.00	Review and revise witness and exhibit list and finalize same for transmission.
05/16/25	Walters, Carla S.	Paralegal/Legal Specialist	3.30	\$1,270.50	Continue work on organizing exhibits in preparation for hearing and upload same to court database.
05/18/25	Contrera, Jack H.	Associate	3.90	\$1,774.50	Conduct analysis of petition documents and signatures.
05/18/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via email with client and fact witness regarding draft declarations in support of response to application for preliminary injunction.
05/18/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review communications from client's outside general counsel related to draft response in opposition to application for preliminary injunction and hearing on the same.
05/18/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review and revise draft declarations in support of response to application for preliminary injunction.
05/18/25	Stine, Lauren E.	Partner	1.10	\$682.00	Evaluate plaintiff's exhibits and confer with client's outside general counsel regarding same.
05/18/25	Stine, Lauren E.	Partner	0.60	\$372.00	Revise declarations for response to preliminary injunction application.
05/19/25	Contrera, Jack H.	Associate	1.90	\$864.50	Proofread and cite check response to preliminary injunction pleading.
05/19/25	Contrera, Jack H.	Associate	0.20	\$91.00	Review of court minute entry.
05/19/25	Contrera, Jack H.	Associate	2.20	\$1,001.00	Draft direct examination outlines for witnesses.
05/19/25	Contrera, Jack H.	Associate	0.50	\$227.50	Meet with fact witness to review declaration.
05/19/25	Contrera, Jack H.	Associate	2.10	\$955.50	Review petition signature documents in connection with preparing exhibit for hearing on application for preliminary injunction.
05/19/25	Contrera, Jack H.	Associate	0.70	\$318.50	Attend strategy meeting for hearing on application for preliminary injunction.
05/19/25	Roberts, Daniel G.	Partner	3.40	\$2,108.00	Review and revise draft response to application for preliminary injunction and supporting declarations and prepare exhibits for same.
05/19/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Strategize internally with L. Stine regarding hearing on preliminary injunction and response to response to application for preliminary injunction.

05/19/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Review executed declaration of custodian of records from representative of vote-now.com and confer internally with L. Stine regarding same.
05/19/25	Roberts, Daniel G.	Partner	1.60	\$992.00	Confer via email and telephone with fact witnesses regarding draft declarations in support of response to application for preliminary injunction and exhibits for same.
05/19/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Draft motion to exceed page limit for response to application for preliminary injunction and proposed order for same.
05/19/25	Stine, Lauren E.	Partner	0.90	\$558.00	Begin to review and revise witness examination outlines.
05/19/25	Stine, Lauren E.	Partner	3.60	\$2,232.00	Continue to work on response to application for preliminary injunction and supporting declarations for filing.
05/20/25	Contrera, Jack H.	Associate	9.60	\$4,368.00	Conduct analysis and review of petition documents [REDACTED] in connection with preparing exhibits for hearing on application for preliminary injunction.
05/20/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Prepare for hearing on application for preliminary injunction.
05/20/25	Roberts, Daniel G.	Partner	7.50	\$4,650.00	Analyze Plaintiffs' exhibits and draft analysis of same for hearing on application for preliminary injunction.
05/20/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Coordinate production of additional exhibit for hearing on application for preliminary injunction.
05/20/25	Stine, Lauren E.	Partner	6.90	\$4,278.00	Communications and work regarding settlement documentation and revisions to same.
05/20/25	Walters, Carla S.	Paralegal/Legal Specialist	2.70	\$1,039.50	Continue work on organizing hard copy of exhibits in prep for hearing.
05/21/25	Contrera, Jack H.	Associate	0.60	\$273.00	Meeting with team to discuss additional hearing preparation steps.
05/21/25	Contrera, Jack H.	Associate	8.10	\$3,685.50	Prepare hearing materials related to petition signatures and related and related exhibits (2.7); conduct review of petition signatures against hearing exhibits identified by Plaintiff and analyze exhibits (5.4).
05/21/25	Contrera, Jack H.	Associate	0.70	\$318.50	Redact and submit additional hearing exhibit.
05/21/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Prepare for hearing on application for preliminary injunction.
05/21/25	Roberts, Daniel G.	Partner	11.00	\$6,820.00	Continue reviewing Plaintiffs' exhibits and drafting analysis of all petition documents included therein in preparation for hearing on application for preliminary injunction.

05/21/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Confer via email and telephone with client witness and fact witness regarding hearing preparation and exhibits.
05/21/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Evaluate research related to lawyer serving as a witness and review findings.
05/21/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Coordinate filing of additional exhibit for hearing on application for preliminary injunction and motion to dismiss.
05/21/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Review filing status of response to application for preliminary injunction and associated motion to exceed page limitation.
05/21/25	Stine, Lauren E.	Partner	9.70	\$6,014.00	Prepare for evidentiary hearing and communications with C. Ekmark and client regarding same.
05/21/25	Walters, Carla S.	Paralegal/Legal Specialist	3.70	\$1,424.50	Continue work on organizing and uploading exhibits in preparation for hearing.
05/22/25	Contrera, Jack H.	Associate	0.50	\$227.50	Preparation of materials and documents for hearing.
05/22/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Confer with client and client's outside general counsel on status of matter and strategize regarding next steps.
05/22/25	Roberts, Daniel G.	Partner	1.80	\$1,116.00	Attend hearing on application for preliminary injunction and motion to dismiss.
05/22/25	Roberts, Daniel G.	Partner	1.90	\$1,178.00	Prepare for hearing on application for preliminary injunction and motion to dismiss, including preparation of exhibit materials.
05/22/25	Stine, Lauren E.	Partner	6.00	\$3,720.00	Prepare for and attend evidentiary hearing and related follow up tasks.
05/22/25	Walters, Carla S.	Paralegal/Legal Specialist	3.50	\$1,347.50	Continue preparing for evidentiary hearing and attend same.
05/23/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Coordinate request for quote from transcription service.
05/23/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Review status of matter and consider additional research tasks.
05/23/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via email with client and client's outside general counsel regarding potential transcript of hearing.
05/23/25	Stine, Lauren E.	Partner	0.40	\$248.00	Follow up tasks and communications regarding hearing and next steps.
05/27/25	Walters, Carla S.	Paralegal/Legal Specialist	0.40	\$154.00	Coordinate with e-scribers to make request for 22May2025 hearing transcript from court.
05/28/25	Stine, Lauren E.	Partner	0.20	\$124.00	Confer with C. Ekmark re: hearing and follow up.
06/02/25	Contrera, Jack H.	Associate	1.20	\$546.00	Read and analyze Plaintiff's reply in support of application for preliminary injunction (.7); conduct initial analysis of materials referenced within the pleading (.5).
06/03/25	Contrera, Jack H.	Associate	0.50	\$227.50	Conduct legal research and analysis of potential legal issues and arguments at issue in hearing on motion to dismiss.

06/03/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via telephone with client (J. Hochman) regarding evidentiary hearing and status of matter.
06/03/25	Stine, Lauren E.	Partner	0.70	\$434.00	Review reply in support of preliminary injunction application.
06/03/25	Stine, Lauren E.	Partner	1.30	\$806.00	Work re: research needed for upcoming oral argument on motion to dismiss.
06/04/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with client (J. Hochman) regarding matter.
06/06/25	Contrera, Jack H.	Associate	2.70	\$1,228.50	Conduct analysis of emails submitted with Plaintiff's reply in support of application for preliminary injunction an draft summary of findings.
06/06/25	Stine, Lauren E.	Partner	0.60	\$372.00	Review and evaluate analysis of emails submitted with plaintiff's reply in support of application for preliminary injunction.
06/09/25	Contrera, Jack H.	Associate	0.40	\$182.00	Review of statutory analysis and case law concerning contractual indemnity suits.
06/10/25	Contrera, Jack H.	Associate	0.40	\$182.00	Review of legal research regarding inter-party contractual indemnity claims.
06/11/25	Contrera, Jack H.	Associate	0.30	\$136.50	Review of research regarding potential [REDACTED] defenses.
06/12/25	Contrera, Jack H.	Associate	0.60	\$273.00	Conduct additional legal research into [REDACTED ] legal issues to be addressed in hearing on motion to dismiss.
06/12/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Work on strategy for upcoming hearings.
06/13/25	Contrera, Jack H.	Associate	0.30	\$136.50	Review of legal research and provide compilation of findings and materials in advance of meeting covering next steps for hearing preparation.
06/16/25	Contrera, Jack H.	Associate	1.20	\$546.00	Meeting to discuss preparation for hearing next week (0.4); conduct further legal research into potential issues expected to be raised at hearing (0.3); review and begin to prepare physical copies and related productions for hearing (0.5).
06/16/25	Roberts, Daniel G.	Partner	1.20	\$744.00	Review and analyze research related to issues to be addressed at hearing and conduct additional legal research on same.
06/16/25	Roberts, Daniel G.	Partner	1.30	\$806.00	Review analysis of Plaintiff's reply in support of motion for preliminary injunction and cross reference petition signatures raised by Plaintiff with exhibits and prior analysis.
06/16/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Confer internally with J. Contrera and L. Stine regarding preparation for oral argument hearing on motion to dismiss.
06/16/25	Stine, Lauren E.	Partner	0.50	\$310.00	Strategy call with J. Contrera and D. Roberts regarding research performed, additional research needed, and related follow up.

06/16/25	Stine, Lauren E.	Partner	0.80	\$496.00	Evaluate research regarding Title 10, statutory history and electronic signatures in preparation for oral argument on motion to dismiss.
06/19/25	Contrera, Jack H.	Associate	0.40	\$182.00	Review of case law concerning statute citations within corporation meeting minutes for use in hearing on motion to dismiss.
06/21/25	Contrera, Jack H.	Associate	4.70	\$2,138.50	Review of case file and preparation of hearing materials, including procedural notes and exhibits for use during hearing on motion to dismiss (1.9); review and update outline for oral argument at hearing and compare against pleadings submitted by opposing counsel (2.8).
06/22/25	Contrera, Jack H.	Associate	0.60	\$273.00	Finalization of hearing preparation documents, including review and formatting of potential exhibits.
06/23/25	Contrera, Jack H.	Associate	3.80	\$1,729.00	Conduct legal research and analysis to identify potential counterarguments likely to be raised by opposing counsel (2.7); organize, format and assemble final materials for effective use during the hearing (1.1).
06/23/25	Contrera, Jack H.	Associate	3.90	\$1,774.50	Preparation of materials for upcoming hearing, including finalization and organization of hearing exhibits (1.9); compile relevant legal authority to support anticipated arguments (.8); update analysis and input into hearing oral argument outline (1.2).
06/23/25	Stine, Lauren E.	Partner	6.50	\$4,030.00	Prepare for oral argument on motion to dismiss, including various research memoranda, evaluation of key exhibits, and supporting papers for motion argument.
06/24/25	Contrera, Jack H.	Associate	3.40	\$1,547.00	Final preparation of physical materials and outline for use in motion to dismiss hearing (1.7); attend hearing (1.2); analyze and discuss hearing proceedings and outcome, and go over next steps in action (0.5).
06/24/25	Stine, Lauren E.	Partner	6.40	\$3,968.00	Prepare for and argue motion to dismiss and related follow up communications with client and tasks.
06/25/25	Stine, Lauren E.	Partner	0.30	\$186.00	Strategy call with outside general counsel regarding motion to dismiss hearing and related follow up.
07/11/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review court's order granting motion to dismiss and analyze likelihood of potential appeal.
07/11/25	Stine, Lauren E.	Partner	0.10	\$62.00	Confer with D. Roberts regarding Application for Fees and Costs.
07/11/25	Stine, Lauren E.	Partner	0.60	\$372.00	Evaluate ruling on Motion to Dismiss and confer (.3) with C. Ekmark regarding fee request and next steps (.2).

07/15/25	Roberts, Daniel G.	Partner	2.50	\$1,550.00	Begin drafting motion for award of attorneys' fees and supporting declaration (2.1); coordinate internally regarding preparing exhibits for motion for award for attorneys' fees (.4).
07/17/25	Roberts, Daniel G.	Partner	3.80	\$2,356.00	Draft application for attorneys' fees and costs and exhibits thereto (3.5); confer internally with L. Stine regarding same (.3).
07/17/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with D. Roberts re: fee application and supporting materials for same (.3).
07/18/25	Roberts, Daniel G.	Partner	5.90	\$3,658.00	Continue drafting and revising application for award of attorneys' fees and costs and supporting exhibits.
07/21/25	Contrera, Jack H.	Associate	0.30	\$136.50	Confer internally with D. Roberts research into attorneys' fees application.
07/21/25	Roberts, Daniel G.	Partner	3.20	\$1,984.00	Continue drafting and revising application for attorneys' fees and costs (2.9); confer internally with J. Contrera regarding research on legal issues relate to application (.3).
07/21/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review and research additional billing information relevant to application for attorneys' fees and costs.
07/21/25	Stine, Lauren E.	Partner	0.20	\$124.00	Confer with C. Ekmark re: fee application (.1); confer with J. Hochman re: fee application timing (.1).
07/22/25	Contrera, Jack H.	Associate	2.70	\$1,228.50	Conduct research into whether secondary counsel can collect on an award of attorneys fees.
07/22/25	Roberts, Daniel G.	Partner	2.80	\$1,736.00	Review and revise application for attorneys' fees and costs.
07/22/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Review research related to legal issues raised by application for award of attorneys' fees and costs.
07/22/25	Roberts, Daniel G.	Partner	1.10	\$682.00	Research legal issues related to fee application
07/22/25	Stine, Lauren E.	Partner	2.30	\$1,426.00	Review and revise fee application (1.0); evaluate itemized statement of fees and costs, including identification of privilege redactions (1.3).
07/23/25	Roberts, Daniel G.	Partner	3.50	\$2,170.00	Review and revise draft fee application and supporting documents.
07/23/25	Roberts, Daniel G.	Partner	1.40	\$868.00	Perform legal research related to legal issues raised by fee application.
07/23/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer internally with L. Stine regarding revisions to the fee application and additional legal research.
07/23/25	Stine, Lauren E.	Partner	2.60	\$1,612.00	Revise Application for Attorneys' Fees and Costs (1.2); revise Stine Declaration for the Application for Attorneys' Fees and Costs (1.4).

07/24/25	Roberts, Daniel G.	Partner	2.80	\$1,736.00	Continue reviewing and revising draft application for attorneys' fees and costs.
07/24/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Perform additional legal research related to legal issues raised in application for attorneys' fees and costs.
07/25/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Draft declarations in support of application for award of attorneys' fees and costs.
07/28/25	Roberts, Daniel G.	Partner	1.90	\$1,178.00	Review and revise declarations in support of application for fees and costs (1.3); review and revise fee and cost itemized statements (.6)
07/28/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Review documents provided by C. Ekmark related to application for award of fees and costs.
07/28/25	Stine, Lauren E.	Partner	0.40	\$248.00	Communications with C. Ekmark re: attorneys' fee application contents and related internal follow up.
07/29/25	Roberts, Daniel G.	Partner	2.60	\$1,612.00	Review and revise exhibits to application for attorneys' fees and costs and exhibits thereto.
07/29/25	Roberts, Daniel G.	Partner	2.50	\$1,550.00	Perform legal research related to [REDACTED].
07/29/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Review and revise application for award of attorneys' fees and costs.
07/30/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Review and revise draft application for attorneys' fees and costs.
07/30/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Confer via email with C. Ekmark regarding draft declaration and exhibit thereto.
07/30/25	Roberts, Daniel G.	Partner	0.90	\$558.00	Perform legal research related to [REDACTED].
07/30/25	Roberts, Daniel G.	Partner	3.30	\$2,046.00	Review and revise draft declarations in support of application for attorneys' fees and costs and exhibits thereto.
07/30/25	Stine, Lauren E.	Partner	3.30	\$2,046.00	Review and revise fee application, itemized Ekmark fees, Stine Declaration and supporting papers for fee application.
07/30/25	Stine, Lauren E.	Partner	0.50	\$310.00	Confer with C. Ekmark re: fee application strategy (.3); communications with J. Hochman re: fee application (.2).
07/30/25	Stine, Lauren E.	Partner	0.50	\$310.00	Communications with D. Roberts re: revisions to fee application and supporting exhibits.

# EXHIBIT B

1 Quarles & Brady LLP  
2 One Renaissance Square  
3 Two North Central Avenue  
4 Suite 600  
5 Phoenix, AZ 85004-2322  
6 TELEPHONE 602-229-5200

7 Lauren Elliott Stine (#025083)  
8 Lauren.Stine@quarles.com  
9 Daniel G. Roberts (#033273)  
10 Daniel.Roberts@quarles.com

11 *Attorneys for Defendant*

12 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
13 IN AND FOR THE COUNTY OF MARICOPA

14 THOMAS J. GUSICH, an individual,  
15 Plaintiff,

16 v.

17 SUN CITY GRAND COMMUNITY  
18 ASSOCIATION, INC., an Arizona  
19 nonprofit corporation,  
20 Defendant.

NO. CV2025-002634

**DECLARATION OF CURTIS S.  
EKMARK IN SUPPORT OF  
DEFENDANT'S APPLICATION FOR  
ATTORNEYS' FEES AND COSTS**

(Assigned to the Hon. Jennifer Ryan-Touhill)

21 I, Curtis S. Ekmark, declare as follows:

22 1. I am the counsel for Defendant Sun City Grand Community Association, Inc.  
23 ("Defendant" or the "Association"). I had oversight over the invoices my former law firm,  
24 CHDB Law LLP ("CHDB Law"), and my current law firm, Ekmark Pecor Law, PLLC  
25 ("Ekmark Pecor Law"), issued to the Association for fees and costs incurred in connection  
26 with this litigation.

27 2. I am submitting this Declaration in support of the Association's Application  
28 for Attorneys' Fees and Costs. I am competent to testify to the matters contained herein.

3. CHDB Law billed time representing the Association in the above-captioned  
action between October 28, 2024 and February 28, 2025, which included collaboration with  
the Association's lead litigation counsel in this matter, Quarles & Brady, LLP ("Quarles &  
Bready"), in evaluating Plaintiff Thomas J. Gusich's ("Plaintiff") demands, allegations, and

1 claims, analyzing Association documents related to Plaintiff's claims, and strategizing  
2 regarding the Association's response to Plaintiff's claims, among other tasks.

3 4. On March 1, 2025, I opened my firm Ekmark Pecor Law, and the Association  
4 agreed to continue to retain my services at my new firm. Ekmark Pecor Law billed time  
5 representing the Association in connection with the litigation between March 1, 2025, and  
6 July 31, 2025.

7 5. I am the primary attorney who worked on this case at CHDB Law.

8 6. The primary attorneys who have worked on this case at Ekmark Pecor Law  
9 are Courtney Pecor and me.

10 7. I worked at CHDB Law until March 1, 2025, and I am currently a partner at  
11 Ekmark Pecor Law. I have been licensed to practice law in Arizona since 1993. I have  
12 dedicated my practice to representing Arizona's community associations in general counsel  
13 matters. The hourly rate I charged the Association for work in this action, both at CHDB  
14 Law and Ekmark Pecor Law, was \$495. This rate is within the range of typical hourly rates  
15 that would be charged by a lawyer with similar experience and credentials in a similar  
16 matter. The Association agreed to this hourly rate for my work in this action.

17 8. My work for the Association in this action has included a wide variety of  
18 tasks: conferring with and advising representatives of the Association and conferring with  
19 lead litigation counsel, Quarles & Brady, on the factual background, ongoing developments,  
20 legal strategy, and attempts to mediate or settle Plaintiffs' claims; conferring with Plaintiff's  
21 counsel regarding the issues in the litigation and in attempts to mediate or negotiate a  
22 settlement; and reviewing, revising, and conferring with Quarles & Brady on all briefing on  
23 pending motions filed for the Association in the litigation; among others.

24 9. Courtney Pecor is a partner at Ekmark Pecor Law. Ms. Pecor has also focused  
25 her career on representing Arizona community associations. The hourly rate Ekmark Pecor  
26 charged the Association for Ms. Pecor's work in this action was \$470. Ms. Pecor's work on  
27 this matter included the following tasks, often in collaboration with Quarles & Brady:  
28 review and analysis of Association documents; preparation of Association documents for

1 production in response to Plaintiff's document requests; hearing preparation, including but  
2 not limited to preparation of hearing exhibits; and review and revision of motion briefing.  
3 Ms. Pecor's rate for this work is within the range of typical hourly rates that would be  
4 charged by a lawyer with similar experience and credentials in a similar matter. The  
5 Association agreed to this hourly rate for Ms. Pecor's work in this action.

6 10. I have reviewed the business records of CHDB Law relative to this matter,  
7 including CHDB Law's billing records for this case. These records are maintained by  
8 attorneys and other CHDB Law professionals. The records were made at or near the time  
9 that the events described occurred by persons that incurred the time. It is the regular practice  
10 of CHDB Law and its attorneys and other timekeepers to create and maintain these records,  
11 including records of time entries with descriptions of the services performed and records of  
12 costs, which records are accurate reflections of the time and costs incurred in the  
13 representation of CHDB Law's clients. The records are maintained in the ordinary course  
14 of CHDB Law's business.

15 11. I have reviewed the business records of Ekmark Pecor Law relative to this  
16 matter, including Ekmark Pecor Law's billing records for this case. These records are  
17 maintained by attorneys and other Ekmark Pecor Law professionals. The records were  
18 made at or near the time that the events described occurred by persons that incurred the  
19 time. It is the regular practice of Ekmark Pecor Law and its attorneys and other timekeepers  
20 to create and maintain these records, including records of time entries with descriptions of  
21 the services performed and records of costs, which records are accurate reflections of the  
22 time and costs incurred in the representation of Ekmark Pecor Law's clients. The records  
23 are maintained in the ordinary course of Ekmark Pecor Law's business.

24 12. Each month, I reviewed the time entries and charges for each lawyer and other  
25 timekeepers for the prior month. I would adjust time entries to a lower amount where  
26 appropriate to ensure the amount charged for the work performed was reasonable. Only  
27 after such review and adjustments would the final bills be sent to the Association. In no  
28

1 circumstance was the Association charged for (nor does this fee application seek) fees for  
2 time not actually spent or billed by CHDB Law or Ekmark Pecor Law.

3 13. A detailed itemization of services rendered by CHDB Law and Ekmark Pecor  
4 Law in this matter for the work by the legal professionals described above is attached hereto  
5 as **Exhibit 1**. This itemization identifies the date of service, the attorney providing the  
6 service, a description of the service, and the time spent providing the service. Exhibit 1 is  
7 a true and correct itemization of the services performed and is based upon CHDB Law's  
8 and Ekmark Pecor Law's contemporaneous time records. The time spent and expenses  
9 incurred, as set forth in Exhibit 1, were reasonable and necessary under the circumstances  
10 of the case.

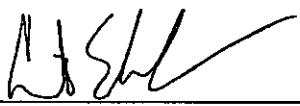
11 14. The Association agreed to pay CHDB Law \$24,205.50 for the work I  
12 performed for the Association in connection with this matter reflected in Exhibit 1.

13 15. The Association agreed to pay Ekmark Pecor Law \$34,042.50 for work  
14 performed by Courtney Pecor and me in connection with this matter reflected in Exhibit 1.

15 16. The Association therefore seeks an award of attorneys' fees charged by  
16 CHDB Law and Ekmark Pecor Law in the total amount of \$58,248.00 for hours of work.

17 I declare under penalty of perjury that the foregoing is true and correct to the best of  
18 my knowledge and belief.

19 EXECUTED this 1st day of August, 2025.

20   
21 \_\_\_\_\_  
22 Curtis S. Ekmark

23  
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# EXHIBIT 1

## CHDB LAW

### Summary of Fees By Person

<u>Attorney/Paralegal</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Total Dollars</u>
Ekmark, Curtis	Partner	495	48.90	\$24,205.50

<u>Date</u>	<u>Attorney/ Paralegal</u>	<u>Orig Hrs</u>	<u>Orig Amt</u>	<u>Narrative</u>
10/28/2024	Ekmark, Curtis	0.90	445.50	Reviewed letter from counsel for Tom.
10/28/2024	Ekmark, Curtis	0.20	99.00	Telephone conference with community manager regarding letter from Tom's attorney.
10/29/2024	Ekmark, Curtis	0.10	49.50	Worked on board code of conduct issue.
10/29/2024	Ekmark, Curtis	1.90	940.50	Research regarding code of conduct.
10/29/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from board member and drafted response regarding Tom.
10/29/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding letter from Tom's attorney and drafted response.
10/29/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from board member regarding Tom issues.
10/29/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president to Tom.
10/29/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from Tom and drafted response to board president.
10/29/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president to Tom regarding meeting.
10/30/2024	Ekmark, Curtis	0.50	247.50	Reviewed ethical rule and reviewed email from Tom's counsel and drafted response and drafted email to
10/30/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager and drafted email to Tom's attorney regarding meeting.
10/31/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from owner regarding Tom.
10/31/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom suit and drafted response.
10/31/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member and drafted response regarding Tom meeting at his home.
10/31/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president reviewed Tom lawsuit.
10/31/2024	Ekmark, Curtis	0.20	99.00	Reviewed research regarding Board's authority to [REDACTED].
10/31/2024	Ekmark, Curtis	0.30	148.50	Telephone conference with community manager regarding Tom meeting.
11/02/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from Tom's attorney and drafted response.
11/03/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding post by Tom.
11/03/2024	Ekmark, Curtis	0.30	148.50	Telephone conference with board member regarding Tom meeting.
11/03/2024	Ekmark, Curtis	0.10	49.50	Research defamation cases.
11/03/2024	Ekmark, Curtis	0.20	99.00	Worked on Tom issues.
11/04/2024	Ekmark, Curtis	0.50	247.50	Telephone conference with community manager regarding Tom issue.

11/4/2024	Ekmark, Curtis	0.10	49.50	Worked on defamation issue.
11/04/2024	Ekmark, Curtis	0.20	99.00	Telephone conference with board member regarding Tom allegations.
11/04/2024	Ekmark, Curtis	0.20	99.00	Telephone conference with community manager regarding Tom issues.
11/04/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from board member and drafted response regarding Tom allegations and response.
11/04/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding mediation.
11/05/2024	Ekmark, Curtis	2.20	1,089.00	Reviewed video of Tom meeting and drafted notes regarding same.
11/05/2024	Ekmark, Curtis	0.30	148.50	Reviewed case law regarding defamation [REDACTED].
11/05/2024	Ekmark, Curtis	0.20	99.00	Telephone conference with community manager regarding Tom issues.
11/05/2024	Ekmark, Curtis	0.10	49.50	Drafted email to community manager regarding litigation.
11/05/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom.
11/05/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom's allegation of lies by employee.
11/05/2024	Ekmark, Curtis	0.40	198.00	Reviewed case law and drafted email to board regarding same.
11/05/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member and points regarding Tom.
11/06/2024	Ekmark, Curtis	0.40	198.00	Reviewed email from board president and statement and Telephone conference with board president
11/07/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president to board member regarding mediation.
11/07/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president to Tom regarding mediation.
11/07/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding mediation with Tom.
11/07/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding mediation.
11/08/2024	Ekmark, Curtis	1.70	841.50	Zoom to discuss Tom issues.
11/08/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager and email from Tom regarding mediation.
11/08/2024	Ekmark, Curtis	0.50	247.50	Reviewed email from community manager regarding response to Tom and Worked on same and
11/08/2024	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding response to Tom.
11/09/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding rebuttal to Tom's claims.
11/09/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding conversation with Tom.
11/09/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding town hall and statements by Tom.
11/11/2024	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager and board members regarding mediation.
11/12/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding statements from Tom.

11/12/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation.
11/12/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom's allegations.
11/12/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding project management.
11/12/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding mediation.
11/12/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation deadline.
11/12/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding [REDACTED] and drafted response.
11/12/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president to Tom regarding mediation.
11/12/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom lawsuit and drafted response.
11/12/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from board president regarding mediation and drafted response.
11/13/2024	Ekmark, Curtis	0.20	99.00	Reviewed code of conduct packet.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed text from board president and drafted response regarding mediation.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email regarding mediation.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding mediation.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email and attachment regarding mediation.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom's demands.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding mediation response.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom's refusal to mediate.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation response.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding lack of mediation response.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding mediation message.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding meeting with Tom.
11/13/2024	Ekmark, Curtis	0.10	49.50	Reviewed text from board president regarding mediation and drafted response regarding Tom.
11/13/2024	Ekmark, Curtis	0.20	99.00	Telephone conference with board president regarding mediation.
11/14/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from Tom and drafted response.
11/14/2024	Ekmark, Curtis	0.30	148.50	Reviewed letter from Tom's attorney and Telephone conference with board president regarding same.
11/14/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom lawsuit and drafted response.
11/14/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom.

11/14/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding [REDACTED] Tom.
11/14/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation.
11/14/2024	Ekmark, Curtis	0.20	99.00	Reviewed letter from Tom's attorney.
11/15/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding lawsuit.
11/15/2024	Ekmark, Curtis	0.70	346.50	Drafted email to board president and community manager regarding mediation.
11/15/2024	Ekmark, Curtis	0.20	99.00	Drafted response to Tom's attorney.
11/15/2024	Ekmark, Curtis	0.10	49.50	Reviewed email regarding mediation.
11/15/2024	Ekmark, Curtis	0.10	49.50	Reviewed email regarding Tom issues from board president.
11/15/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding letter from Tom's attorney.
11/15/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom letter.
11/16/2024	Ekmark, Curtis	0.50	247.50	Reviewed cases regarding code of conduct issues.
11/16/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation.
11/17/2024	Ekmark, Curtis	0.10	49.50	Drafted email to community manager regarding interaction with Tom.
11/18/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding Tom and [REDACTED] and drafted response.
11/18/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation.
11/18/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding mediation.
11/18/2024	Ekmark, Curtis	0.20	99.00	Telephone conference with board member regarding Tom issues.
11/18/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from community manager and report regarding [REDACTED].
11/18/2024	Ekmark, Curtis	0.10	49.50	Telephone conference with board member regarding Tom issues.
11/18/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding lawsuit and drafted response.
11/19/2024	Ekmark, Curtis	0.50	247.50	Reviewed email from opposing counsel regarding mediation and drafted email to board president and
11/19/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding suit.
11/19/2024	Ekmark, Curtis	0.20	99.00	Reviewed records request by Tom and email from community manager and Telephone conference with
11/19/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation.
11/20/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation.
11/20/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from board member regarding message from Tom's attorney and drafted response.
11/20/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding letter from Tom's attorney.
11/20/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation and drafted response and made notes for

11/20/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding mediation.
11/20/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding mediation issues.
11/20/2024	Ekmark, Curtis	0.10	49.50	Reviewed email regarding mediation process.
11/20/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding mediation outcomes.
11/25/2024	Ekmark, Curtis	0.10	49.50	Drafted email to Tom's attorney regarding mediation.
11/25/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from board president and notes from board members regarding mediation.
11/25/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from Tom's counsel and drafted email to community manager and board president
11/28/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from Tom's attorney and drafted email to board members regarding same.
11/28/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from Tom's counsel regarding mediation.
12/02/2024	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding mediation and town hall.
12/03/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president to board member regarding [REDACTED].
12/05/2024	Ekmark, Curtis	0.10	49.50	Reviewed code of conduct issue.
12/08/2024	Ekmark, Curtis	0.10	49.50	Reviewed email regarding mediation.
12/08/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation.
12/09/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board member and drafted response regarding mediation.
12/10/2024	Ekmark, Curtis	0.10	49.50	Reviewed email regarding mediation and drafted response.
12/10/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from opposing counsel regarding mediation and drafted response.
12/11/2024	Ekmark, Curtis	0.20	99.00	Reviewed email from opposing counsel regarding mediation and reviewed file and drafted response
12/20/2024	Ekmark, Curtis	0.10	49.50	Telephone conference with board president regarding mediation and communication.
12/24/2024	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation.
01/06/2025	Ekmark, Curtis	0.10	49.50	Drafted email to Tom's attorney regarding executive sessions.
01/06/2025	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding executive sessions.
01/06/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from Tom's attorney regarding executive sessions and mediation.
01/06/2025	Ekmark, Curtis	0.10	49.50	Drafted response to Tom's counsel regarding mediation.
01/07/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from counsel for Tom regarding mediation.
01/07/2025	Ekmark, Curtis	0.10	49.50	Drafted email to board president and community manager regarding mediation.
01/09/2025	Ekmark, Curtis	0.20	99.00	Reviewed letter from Tom's attorney and drafted response.

01/10/2025	Ekmark, Curtis	0.10	49.50	Reviewed emails from board president regarding mediation.
01/11/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding mediation and drafted response.
01/12/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding meeting with Tom.
01/13/2025	Ekmark, Curtis	0.50	247.50	Reviewed file and drafted email to Tom's counsel and drafted email to community manager and board
01/23/2025	Ekmark, Curtis	0.10	49.50	Reviewed report of suit filed by Tom.
01/23/2025	Ekmark, Curtis	0.10	49.50	Drafted email to board president and community manager regarding suit filed by Tom.
01/23/2025	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding suit by Tom.
01/24/2025	Ekmark, Curtis	0.90	445.50	Reviewed lawsuit and drafted email to community manager and board president regarding same.
01/24/2025	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding suit.
01/24/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding Tom's suit.
01/25/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board president and drafted response regarding summons and service.
01/26/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member and drafted response regarding Tom suit.
01/26/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding lawsuit.
01/26/2025	Ekmark, Curtis	0.10	49.50	Reviewed text from board president and drafted response.
01/27/2025	Ekmark, Curtis	0.60	297.00	Reviewed complaint to prepare for meeting and made notes regarding same.
01/27/2025	Ekmark, Curtis	1.50	742.50	Zoom with board president and community manager regarding lawsuit.
01/27/2025	Ekmark, Curtis	0.10	49.50	Drafted email to litigation counsel regarding complaint.
01/27/2025	Ekmark, Curtis	0.20	99.00	Telephone conference with litigation counsel regarding suit filed by Tom.
01/27/2025	Ekmark, Curtis	0.40	198.00	Drafted email to board president regarding suit.
01/27/2025	Ekmark, Curtis	0.20	99.00	Reviewed email from community manager and drafted response to broker.
01/27/2025	Ekmark, Curtis	0.10	49.50	Drafted email to community manager and board president regarding [REDACTED].
01/27/2025	Ekmark, Curtis	0.20	99.00	Drafted email to board president regarding lawsuit.
01/27/2025	Ekmark, Curtis	0.10	49.50	Reviewed email regarding lawsuit filed by Tom.
01/27/2025	Ekmark, Curtis	0.10	49.50	Reviewed email regarding service.
01/28/2025	Ekmark, Curtis	0.10	49.50	Reviewed email regarding [REDACTED].
01/28/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding [REDACTED] and made notes regarding same.
01/29/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding suit.
01/29/2025	Ekmark, Curtis	0.10	49.50	Reviewed email regarding service.
01/29/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding message pertaining to lawsuit.

01/29/2025	Ekmark, Curtis	0.10	49.50	Reviewed email and updated language regarding lawsuit.
01/29/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager with multiple questions.
01/29/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board president to board member regarding lawsuit.
01/29/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding lawsuit.
01/30/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding lawsuit.
01/30/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding suit.
01/30/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding suit communication.
01/30/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding lawsuit and made notes regarding same.
01/31/2025	Ekmark, Curtis	0.60	297.00	Reviewed complaint and drafted statutory memo.
01/31/2025	Ekmark, Curtis	0.20	99.00	Reviewed revised statutory memo and drafted email to community manager regarding same.
02/02/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board president regarding complaint.
02/04/2025	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding lawsuit.
02/05/2025	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding lawsuit.
02/06/2025	Ekmark, Curtis	0.50	247.50	Reviewed governing documents and Telephone conference with community manager regarding
02/06/2025	Ekmark, Curtis	0.20	99.00	Telephone conference with litigation counsel.
02/08/2025	Ekmark, Curtis	0.40	198.00	Reviewed NPCA provisions regarding committees of board and duties of directors and codes of conduct.
02/11/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from counsel for owner regarding mediation and drafted response and drafted email to
02/12/2025	Ekmark, Curtis	0.40	198.00	Telephone conference with community manager and board president regarding [REDACTED].
02/12/2025	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding representation and answer.
02/12/2025	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding answer and mediation.
02/13/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager and drafted response to litigation counsel.
02/13/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from litigation counsel regarding [REDACTED].
02/13/2025	Ekmark, Curtis	0.20	99.00	Reviewed email from litigation counsel and drafted response and drafted email to community manager
02/13/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager and drafted response regarding extension and denial
02/13/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager reviewed extension request and drafted response.
02/13/2025	Ekmark, Curtis	0.20	99.00	Telephone conference with community manager and board president regarding denial of extension
02/13/2025	Ekmark, Curtis	0.60	297.00	Telephone conference with board president and community manager and Telephone conference with

02/15/2025	Ekmark, Curtis	0.20	99.00	Reviewed proposed response from litigation counsel to opposing counsel and drafted response.
02/16/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding answer.
02/17/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from litigation counsel regarding answer.
02/18/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from litigation counsel and email from tom's attorney and drafted email to community
02/19/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from litigation counsel regarding amended complaint.
02/20/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding mediation.
02/20/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding mediation
02/20/2025	Ekmark, Curtis	0.30	148.50	Telephone conference with board president regarding recall and lawsuit.
02/20/2025	Ekmark, Curtis	0.20	99.00	Telephone conference with litigation counsel regarding pleadings filed by opposing counsel.
02/20/2025	Ekmark, Curtis	0.70	346.50	Telephone conference with litigation counsel and board president and community manager regarding
02/20/2025	Ekmark, Curtis	5.90	2,920.50	Reviewed pleadings filed by Tom and Telephone conference with litigation counsel regarding same
02/21/2025	Ekmark, Curtis	0.50	247.50	Reviewed file and drafted email to litigation counsel regarding petition arguments.
02/21/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding lawsuit defense and drafted response.
02/21/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding recall.
02/21/2025	Ekmark, Curtis	0.20	99.00	Reviewed email from litigation counsel regarding hearing date and Telephone conference with
02/21/2025	Ekmark, Curtis	0.10	49.50	Telephone conference with community manager regarding recall.
02/21/2025	Ekmark, Curtis	0.60	297.00	Reviewed email and text from board president and Telephone conference with board president and
02/22/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from litigation counsel and drafted response regarding posting.
02/22/2025	Ekmark, Curtis	0.50	247.50	Drafted email to community manager and board members regarding recall issues.
02/22/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from litigation counsel regarding docket.
02/22/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding petition.
02/22/2025	Ekmark, Curtis	0.10	49.50	Reviewed email and post regarding [REDACTED].
02/22/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding [REDACTED].
02/22/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from board member regarding [REDACTED].
02/25/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from litigation counsel regarding [REDACTED] and drafted response.
02/26/2025	Ekmark, Curtis	0.10	49.50	Reviewed email from community manager regarding [REDACTED] and drafted email to litigation counsel

02/26/2025	Ekmark, Curtis	0.20	99.00	Reviewed email from litigation counsel and drafted response regarding hearing issues.
02/27/2025	Ekmark, Curtis	0.20	99.00	Telephone conference with litigation counsel regarding call with Tom's attorney.
<b>TOTAL</b>		<b>48.90</b>	<b>24,205.50</b>	



**EKMARK PECOR LAW**

**SUMMARY OF FEES BY PERSON**

<b><u>ATTORNEY/PARELGAL</u></b>	<b><u>TITLE</u></b>	<b><u>HOURS</u></b>	<b><u>RATE/HR</u></b>	<b><u>DOLLARS</u></b>
Ekmark, Curtis	Partner	55.1	495	\$ 27,274.50
Percor, Cortney	Partner	14.4	470	\$ 6,768.00
<b>TOTAL</b>		<b>69.5</b>		<b>\$ 34,042.50</b>

<b>DATE</b>	<b>ATTY/PARA.</b>	<b>HOURS</b>	<b>AMOUNT</b>	<b>DESCRIPTION</b>
3/5/2025	Ekmark, Curtis	0.1	49.5	Reviewed email from litigation counsel and drafted response regarding position statement.
3/6/2025	Ekmark, Curtis	0.5	247.5	Reviewed response drafted by litigation counsel and telephone conference with litigation counsel regarding same.
3/7/2025	Ekmark, Curtis	0.5	247.5	Telephone conference with litigation counsel regarding hearing and telephone conference with community manager regarding hearing and made notes regarding strategy.
3/7/2025	Ekmark, Curtis	0.1	49.5	Reviewed email regarding hearing.
3/7/2025	Ekmark, Curtis	0.2	99	Reviewed email from litigation counsel and records request by Tom and drafted response.
3/9/2025	Ekmark, Curtis	0.4	198	Drafted email to litigation counsel and reviewed email from litigation counsel and drafted report to board and drafted response to membership.
3/9/2025	Ekmark, Curtis	0.1	49.5	Telephone conference with community manager regarding message to community.
3/9/2025	Ekmark, Curtis	0.1	49.5	Reviewed email from board president regarding Tom update to board.
3/9/2025	Ekmark, Curtis	0.1	49.5	Reviewed update from litigation counsel.
3/9/2025	Ekmark, Curtis	0.2	99	Reviewed and revised message to community and email to board president and community manager regarding same.
3/9/2025	Ekmark, Curtis	0.1	49.5	Telephone conference with board president regarding message to owners.
3/9/2025	Ekmark, Curtis	0.1	49.5	Reviewed email from board president regarding update to community.
3/9/2025	Ekmark, Curtis	0.1	49.5	Reviewed email from board president regarding message to community.
3/9/2025	Ekmark, Curtis	0.1	49.5	Reviewed email from board member regarding message to community.
3/9/2025	Ekmark, Curtis	0.1	49.5	Reviewed email from board president regarding message to community.
3/10/2025	Ekmark, Curtis	0.1	49.5	Telephone conference with board member regarding communication to membership.
3/12/2025	Ekmark, Curtis	0.1	49.5	Reviewed email from community manager to litigation counsel.
3/12/2025	Ekmark, Curtis	0.2	99	Telephone conference with community manager regarding [REDACTED] for lawsuit.
3/13/2025	Ekmark, Curtis	0.1	49.5	Reviewed email from litigation counsel regarding records request.

3/18/2025	Ekmark,Curtis	0.2	99	Telephone conference with litigation counsel regarding document request and motion to dismiss.
3/18/2025	Ekmark,Curtis	0.3	148.5	Reviewed email from litigation counsel regarding discovery sent by Tom's attorney and worked on same.
3/18/2025	Pecor,Courtney	0.2	94	Worked on Gusich v. Sun City Grand records request issues.
3/19/2025	Ekmark,Curtis	0.2	99	Reviewed email from board president and website set up by Tom.
3/19/2025	Ekmark,Curtis	1.3	643.5	Zoom with board to discuss [REDACTED].
3/20/2025	Ekmark,Curtis	0.2	99	Telephone conference with litigation counsel regarding document disclosure.
3/20/2025	Ekmark,Curtis	0.2	99	Telephone conference with litigation counsel regarding new evidence and strategy.
3/20/2025	Ekmark,Curtis	0.3	148.5	Telephone conference with litigation counsel regarding strategy and sent email to board member regarding email sent to owners and evidence.
3/21/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding records disclosure.
3/21/2025	Ekmark,Curtis	0.1	49.5	Reviewed email regarding legislation and drafted response.
3/23/2025	Ekmark,Curtis	0.2	99	Reviewed file and drafted settlement offer email to opposing counsel.
3/26/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager and drafted response regarding Tom settlement.
3/27/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from board president regarding tom and lawsuit statements and telephone conference with community manager regarding same and drafted email to litigation counsel regarding
3/27/2025	Ekmark,Curtis	0.1	49.5	Drafted email to litigation counsel regarding Tom issues.
3/31/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from board president and drafted response regarding [REDACTED].
4/1/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding motion to dismiss.
4/2/2025	Ekmark,Curtis	2.2	1,089.00	Reviewed motion to dismiss and drafted notes and email to litigation counsel.
4/3/2025	Pecor,Courtney	0.8	376	Prepared Quarles attorney for hearing regarding verification of petition database.
4/9/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel and attachments and drafted response.
4/9/2025	Ekmark,Curtis	0.2	99	Reviewed email and minutes and drafted email to litigation counsel regarding same.
4/9/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from board president to litigation counsel regarding filing.
4/9/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding filing.
4/9/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding filing.
4/9/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager regarding filing.
4/9/2025	Ekmark,Curtis	0.1	49.5	Telephone conference with litigation counsel regarding minutes.
4/9/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding motion.
4/9/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from former board president regarding filing.
4/9/2025	Ekmark,Curtis	0.1	49.5	Reviewed email and attachment regarding filing.
4/9/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from board member regarding declaration.

4/14/2025	Ekmark,Curtis	0.2	99	Telephone conference with community manager regarding club charter and Tom case.
4/14/2025	Ekmark,Curtis	0.2	99	Worked on recall issue to help litigation counsel prepare for hearing.
4/14/2025	Pecor,Courtney	0.3	141	Reviewed and responded to emails from Quarles attorney regarding owner list and signatures.
4/15/2025	Ekmark,Curtis	0.2	99	Reviewed email from community manager and email from vendor regarding Tom and drafted email to litigation counsel regarding defense.
4/15/2025	Ekmark,Curtis	0.3	148.5	Telephone conference with litigation counsel regarding hearing evidence.
4/15/2025	Ekmark,Curtis	0.2	99	Worked on evidence for Tom hearing.
4/15/2025	Ekmark,Curtis	0.2	99	Reviewed recall analysis to send to litigation counsel.
4/15/2025	Pecor,Courtney	0.3	141	Phone call with litigation counsel regarding hearing evidence.
4/15/2025	Pecor,Courtney	0.3	141	Worked on hearing evidence and drafted email to litigation counsel regarding same.
4/15/2025	Ekmark,Curtis	0.1	49.5	Reviewed recall analysis.
4/21/2025	Ekmark,Curtis	0.2	99	Telephone conference with litigation counsel.
4/22/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from opposing counsel regarding response to motion.
4/23/2025	Ekmark,Curtis	0.1	49.5	Reviewed pleading filed by Tom's attorney
4/23/2025	Ekmark,Curtis	0.1	49.5	Drafted email to litigation counsel regarding pleading filed by Tom.
4/23/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding Tom's pleading and drafted response.
4/26/2025	Ekmark,Curtis	2.2	1,089.00	Reviewed response to motion to dismiss filed by Tom and drafted email to litigation counsel and drafted email to community manager regarding same.
4/26/2025	Ekmark,Curtis	0.9	445.5	Reviewed recall statute to worked on reply brief.
4/26/2025	Ekmark,Curtis	1	495	Reviewed governing documents for arguments in support of reply brief.
4/26/2025	Ekmark,Curtis	0.8	396	Reviewed NPCA to respond to brief filed by Tom.
4/28/2025	Ekmark,Curtis	0.3	148.5	Telephone conference with community manager regarding lease and Tom suit and email bikes.
4/28/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager regarding Tom vote.
4/29/2025	Pecor,Courtney	3.4	1,598.00	Reviewed petition database and final voting report to prepare for litigation.
4/29/2025	Ekmark,Curtis	0.1	49.5	Reviewed email to litigation counsel.
4/29/2025	Ekmark,Curtis	2.9	1,435.50	Worked on recall analysis to prepare for call with litigation counsel.
4/30/2025	Pecor,Courtney	2.5	1,175.00	Worked on final Gusich voting results compared to petition analysis.
4/30/2025	Ekmark,Curtis	0.5	247.5	Prepared for and participated in call with litigation counsel.
5/3/2025	Ekmark,Curtis	0.3	148.5	Reviewed analysis of Tom recall vote and drafted email to litigation counsel regarding same.
5/3/2025	Ekmark,Curtis	0.2	99	Reviewed letter from Tom attorney and records request.
5/5/2025	Pecor,Courtney	0.1	47	Drafted email to litigation counsel regarding Gusich signature analysis.

5/5/2025	Pecor,Courtney	0.7	329	Zoom with Quarles litigation counsel regarding records request and recall signatures.
5/5/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding Tom records request and drafted response.
5/5/2025	Ekmark,Curtis	0.3	148.5	Reviewed email from litigation counsel and attachments to prepare for call.
5/5/2025	Ekmark,Curtis	0.7	346.5	Zoom with litigation counsel to discuss reply brief and records request from Tom and hearing.
5/5/2025	Ekmark,Curtis	0.2	99	Reviewed recall analysis for litigation counsel.
5/6/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager regarding Tealstone and drafted email to litigation counsel.
5/6/2025	Pecor,Courtney	0.4	188	Reviewed documents and made notes to prepare for call with community manager and Quarles litigation attorney regarding Gusich recall, records request and analysis of who signed
5/7/2025	Ekmark,Curtis	0.2	99	Reviewed email from community manager and attachments regarding vote issues raised by Tom.
5/7/2025	Ekmark,Curtis	0.9	445.5	Reviewed reply brief and drafted email to litigation counsel.
5/7/2025	Ekmark,Curtis	0.2	99	Zoom with litigation counsel to discuss reply brief.
5/7/2025	Ekmark,Curtis	0.8	396	Reviewed NPCA and drafted email to litigation counsel regarding same to use in reply brief.
5/7/2025	Ekmark,Curtis	0.1	49.5	Reviewed pleading filed by litigation counsel.
5/7/2025	Ekmark,Curtis	0.3	148.5	Reviewed text from litigation counsel and reviewed email and attachments regarding records request by Tom and drafted response.
5/7/2025	Ekmark,Curtis	0.1	49.5	Reviewed emails regarding Tom's records request.
5/8/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding recall votes.
5/8/2025	Ekmark,Curtis	0.1	49.5	Reviewed response from community manager regarding recall votes.
5/8/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager regarding recall vote issue.
5/8/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding voting allegations made by Tom.
5/8/2025	Ekmark,Curtis	0.2	99	Reviewed email from litigation counsel regarding vote allegations made by Tom and drafted response and telephone conference with litigation counsel regarding same.
5/8/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding voting and drafted response.
5/8/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager to litigation counsel regarding voting issue raised by Tom.
5/8/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager to litigation counsel and attached vote results for hearing.
5/8/2025	Ekmark,Curtis	0.6	297	Reviewed revised reply brief and telephone conference with litigation counsel regarding same.
5/14/2025	Pecor,Courtney	0.1	47	Phone call with Quarles regarding recall issues.
5/14/2025	Pecor,Courtney	0.5	235	Reviewed and responded to email from Quarles regarding petition database and email spreadsheet.
5/14/2025	Ekmark,Curtis	0.2	99	Reviewed email from litigation counsel and worked on document request.
5/15/2025	Pecor,Courtney	0.3	141	Phone call with Quarles attorney regarding Gusich recall.

5/15/2025	Pecor,Courtney	1.7	799	Worked on recall analysis and drafted email to Quarles litigation team regarding same.
5/15/2025	Ekmark,Curtis	0.2	99	Telephone conference with litigation counsel regarding hearing exhibits and witnesses.
5/15/2025	Ekmark,Curtis	0.4	198	Worked on recall issue for litigation counsel and telephone conference with litigation counsel regarding same.
5/15/2025	Ekmark,Curtis	0.8	396	Reviewed email from litigation counsel and text from litigation counsel and telephone conference with litigation counsel regarding recall challenge by Tom.
5/15/2025	Ekmark,Curtis	0.2	99	Reviewed email from Tom's attorney and text from litigation counsel and drafted response.
5/15/2025	Ekmark,Curtis	0.1	49.5	Telephone conference with community manager regarding recall issues and Tom challenge.
5/15/2025	Ekmark,Curtis	0.3	148.5	Drafted email to litigation counsel regarding electronic voting issues.
5/15/2025	Ekmark,Curtis	0.1	49.5	Telephone conference with litigation counsel regarding discovery dispute with Tom's attorney.
5/15/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding hearing exhibits.
5/15/2025	Ekmark,Curtis	0.5	247.5	Worked on recall details to provide to litigation counsel regarding hearing.
5/15/2025	Ekmark,Curtis	0.3	148.5	Telephone conference with litigation counsel regarding email from opposing counsel regarding hearing.
5/16/2025	Ekmark,Curtis	0.5	247.5	Reviewed email from litigation counsel and list of witnesses and exhibits and telephone conference with litigation counsel regarding same.
5/16/2025	Ekmark,Curtis	0.1	49.5	Telephone conference with litigation counsel regarding exhibits.
5/16/2025	Ekmark,Curtis	0.2	99	Reviewed email from litigation counsel regarding disclosure and drafted response.
5/16/2025	Ekmark,Curtis	0.2	99	Reviewed email from litigation counsel and telephone conference with litigation counsel regarding [REDACTED].
5/16/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding minutes and exhibits for hearing.
5/16/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from Tom's attorney regarding hearing.
5/16/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding witness preparation.
5/16/2025	Ekmark,Curtis	0.1	49.5	Reviewed minutes and documents to be used at trial.
5/16/2025	Ekmark,Curtis	0.1	49.5	Reviewed email regarding witness prep for hearing.
5/16/2025	Ekmark,Curtis	0.1	49.5	Reviewed email and attachments for hearing exhibits.
5/16/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel to Tom attorney regarding document production.
5/16/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding petition.
5/16/2025	Ekmark,Curtis	0.5	247.5	Worked on petition issues for hearing.
5/17/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding witness prep and drafted response.
5/17/2025	Ekmark,Curtis	0.3	148.5	Reviewed email from litigation counsel and witness and exhibit list submitted by Tom and drafted response and drafted email to community manager regarding same.

5/17/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding sealing record.
5/17/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding witnesses.
5/17/2025	Ekmark,Curtis	0.9	445.5	Reviewed draft of response to motion for injunction.
5/17/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager regarding witnesses.
5/17/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel and witness list.
5/17/2025	Ekmark,Curtis	0.2	99	Telephone conference with community manager regarding witness list and drafted email to litigation counsel regarding
5/18/2025	Pecor,Courtney	0.5	235	Reviewed exhibits and witness list and made notes to prepare for call with Quarles litigation team.
5/18/2025	Ekmark,Curtis	0.9	445.5	Reviewed documents disclosed by opposing counsel for hearing.
5/18/2025	Ekmark,Curtis	0.5	247.5	Telephone conference with litigation counsel regarding exhibits and witnesses disclosed by opposing counsel.
5/18/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding Tom's complaint under standards and drafted response.
5/18/2025	Ekmark,Curtis	0.1	49.5	Reviewed email regarding witness preparation and drafted response.
5/18/2025	Ekmark,Curtis	2.2	1,089.00	Drafted outline of arguments and drafted email to litigation counsel regarding same.
5/19/2025	Ekmark,Curtis	0.2	99	Telephone conference with litigation counsel regarding hearing strategy.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel and minute entry from court.
5/19/2025	Ekmark,Curtis	0.8	396	Reviewed email from litigation counsel and revised response to application for injunction and telephone conference with litigation counsel regarding same.
5/19/2025	Ekmark,Curtis	0.1	49.5	Worked on recall analysis for hearing.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding witness declaration.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding expense associated with special meeting.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager to litigation counsel regarding special meeting.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed email regarding mootness issue.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed updated witness declaration.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding exhibit.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding exhibits for hearing.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel to witness.
5/19/2025	Ekmark,Curtis	0.1	49.5	Reviewed filing by litigation counsel.
5/20/2025	Pecor,Courtney	1.1	517	Reviewed Gusich trial exhibits, petition database and final voting results and drafted email to Quarles team regarding same.
5/20/2025	Ekmark,Curtis	1.6	792	Zoom with litigation counsel and witnesses.
5/20/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from community manager to litigation counsel regarding documents.
5/20/2025	Ekmark,Curtis	0.2	99	Reviewed email and article written by witness.
5/20/2025	Ekmark,Curtis	0.1	49.5	Reviewed email regarding meeting at Tom's home.

5/20/2025	Ekmark,Curtis	0.9	445.5	Drafted list of issues to watch out for on cross-examination.
5/20/2025	Ekmark,Curtis	0.2	99	Telephone conference with litigation counsel regarding witness selection.
5/20/2025	Ekmark,Curtis	0.1	49.5	Reviewed motion to quash.
5/20/2025	Ekmark,Curtis	0.2	99	Reviewed emails and executive session minutes pertaining to Tom case.
5/20/2025	Ekmark,Curtis	0.1	49.5	Reviewed email and board talking points to prepare for hearing.
5/20/2025	Ekmark,Curtis	0.1	49.5	Reviewed email and executive session minutes to prepare for hearing.
5/20/2025	Ekmark,Curtis	0.1	49.5	Reviewed censorship memo pertaining to Tom.
5/20/2025	Ekmark,Curtis	0.5	247.5	Telephone conference with litigation counsel regarding oral argument and reviewed emails and drafted response.
5/21/2025	Ekmark,Curtis	0.2	99	Reviewed email and drafted witness declaration.
5/21/2025	Ekmark,Curtis	0.2	99	Telephone conference with litigation counsel regarding hearing strategy.
5/21/2025	Ekmark,Curtis	1	495	Reviewed outline from litigation counsel and drafted response and potential questions from judge.
5/21/2025	Ekmark,Curtis	0.1	49.5	Reviewed exhibit to be used at hearing.
5/21/2025	Ekmark,Curtis	0.1	49.5	Reviewed email to community manager regarding exhibit.
5/21/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from former board president to litigation counsel.
5/22/2025	Ekmark,Curtis	0.1	49.5	Drafted text to litigation counsel regarding hearing and reviewed response.
5/22/2025	Ekmark,Curtis	0.5	247.5	Reviewed email from litigation counsel and drafted response regarding standing and indemnity claim.
5/22/2025	Ekmark,Curtis	0.1	49.5	Telephone conference with litigation counsel regarding executive session issues.
5/22/2025	Ekmark,Curtis	0.1	49.5	Reviewed text from litigation counsel and drafted response regarding executive sessions.
5/22/2025	Ekmark,Curtis	0.2	99	Telephone conference with board president regarding hearing.
5/22/2025	Ekmark,Curtis	0.3	148.5	Telephone conference with litigation counsel regarding hearing.
5/22/2025	Ekmark,Curtis	0.1	49.5	Drafted email to community manager and response to members.
5/22/2025	Ekmark,Curtis	0.1	49.5	Reviewed email regarding trial date.
5/23/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding hearing.
5/23/2025	Ekmark,Curtis	0.1	49.5	Reviewed email regarding Tom notice.
5/23/2025	Ekmark,Curtis	0.1	49.5	Drafted email to litigation counsel regarding hearing.
5/23/2025	Ekmark,Curtis	0.2	99	Telephone conference with community manager regarding hearing and contract issues and open meeting law.
5/25/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel regarding hearing transcript.
5/28/2025	Ekmark,Curtis	0.2	99	Telephone conference with litigation counsel regarding hearing issues.
5/28/2025	Ekmark,Curtis	0.1	49.5	Reviewed order in Tom case.
6/2/2025	Ekmark,Curtis	0.2	99	Telephone conference with board president regarding Tom and attorney fee issues.

6/7/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from board president and text from Tom and drafted response.
6/7/2025	Ekmark,Curtis	0.2	99	Telephone conference with board president regarding [REDACTED].
6/8/2025	Ekmark,Curtis	0.1	49.5	Worked on rebutting arguments made by Tom's attorney in reply brief.
6/10/2025	Ekmark,Curtis	0.1	49.5	Worked response to allegations in Tom's reply brief.
6/14/2025	Ekmark,Curtis	0.2	99	Worked on rebutting reply brief.
6/14/2025	Pecor,Courtney	1.2	564	Worked on comments to Dessales Reply to Defendant's Response to Plaintiff's Application for a Preliminary Injunction.
6/16/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel and drafted response.
6/21/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel and drafted response regarding oral argument.
6/21/2025	Ekmark,Curtis	0.3	148.5	Reviewed CAI model code of conduct for board members and drafted email to litigation counsel regarding same.
6/23/2025	Ekmark,Curtis	0.3	148.5	Made notes and Telephone conference with litigation counsel to prepare for oral argument.
6/24/2025	Ekmark,Curtis	0.1	49.5	Reviewed email from litigation counsel.
6/25/2025	Ekmark,Curtis	0.5	247.5	Telephone conference with litigation counsel and telephone conference with community manager and drafted update to owners.
7/10/2025	Ekmark,Curtis	0.2	99	Reviewed emails from board member regarding lawsuit and drafted response and drafted email to community manager regarding same.
7/11/2025	Ekmark,Curtis	0.9	445.5	Reviewed text from litigation counsel and reviewed email and court's ruling and telephone conference with litigation counsel regarding same and telephone conference with board president regarding same.
7/14/2025	Ekmark,Curtis	0.1	49.5	Telephone conference with board member regarding ruling.
7/18/2025	Ekmark,Curtis	0.3	148.5	Reviewed email from community manager and revised statutory memo regarding Gusich.
7/18/2025	Ekmark,Curtis	0.2	99	Reviewed and revised statutory memo and drafted email to community manager regarding same for Gusich lawsuit.
7/21/2025	Ekmark,Curtis	0.1	49.5	Telephone conference with litigation counsel regarding fee application.
7/21/2025	Ekmark,Curtis	0.2	99	Worked on fee application.
7/22/2025	Ekmark,Curtis	0.1	49.5	Telephone conference with litigation counsel regarding fee application.
7/22/2025	Ekmark,Curtis	0.1	49.5	Worked on fee application.
7/24/2025	Ekmark,Curtis	0.5	247.5	Worked on fee application and drafted email to community manager regarding same.
7/24/2025	Ekmark,Curtis	0.1	49.5	Telephone conference with community manager regarding fee application.
7/25/2025	Ekmark,Curtis	0.3	148.5	Reviewed email from staff and attached agreement and telephone conference with staff regarding same.
7/27/2025	Ekmark,Curtis	0.9	445.5	Reviewed file to assist with fee application for Tom case.
7/28/2025	Ekmark,Curtis	0.1	49.5	Worked on fee application.

# EXHIBIT C



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Washington, DC  
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**VERIFIED STATEMENT OF COSTS**

<b><u>DATE</u></b>	<b><u>COSTS AND DISBURSEMENTS</u></b>	<b><u>AMOUNT</u></b>
02/26/25	Vendor: Chase Card Services - 5950/7469; Invoice#: 2025036008; Date: 2/20/2025 - Maricopa County Superior Court - #11155023 - 2/20/2025 - Notice of Appearance (initial filing fee)	\$277.59
03/06/25	Vendor: Chase Card Services - 5950/7469; Invoice#: 2025036041; Date: 3/6/2025 - Maricopa County Superior Court - #11238678 - 3/6/2025 - Response to Plaintiff's Application for OSC	\$6.70
03/06/25	Vendor: Chase Card Services - 5950/7469; Invoice#: 2025036044; Date: 3/6/2025 - Maricopa County Superior Court - #11238678 - 3/6/2025 - Response to Plaintiff's Application for an Order to Show Cause	\$6.70
04/10/25	Vendor: First Legal Network LLC; Invoice#: 26111982; Date: 4/15/2025 - Dessauls Law Group	\$31.36
05/07/25	Vendor: Chase Card Services - 5950/7469; Invoice#: 2025036340; Date: 5/7/2025 - Maricopa County Superior Court - #11543679 - 5/7/2025 - Notice of First Extension of Time to File Reply ISO MTD	\$6.70
05/08/25	Vendor: Chase Card Services - 5950/7469; Invoice#: 2025036344; Date: 5/8/2025 - Maricopa County Superior Court - #11553376 - 5/8/2025 - Defendant's Reply ISO MTD Plaintiff's First Amended Complaint	\$6.70
05/16/25	Vendor: Chase Card Services - 5950/7469; Invoice#: 2025036328; Date: 5/16/2025 - Maricopa County Superior Court - #11598296 - 5/16/2025 - Sun City List of Witnesses and Exhibits for May 22 2025 10a Evidentiary Hearing	\$6.70
05/19/25	Vendor: Chase Card Services - 5950/7469; Invoice#: 2025036326; Date: 5/19/2025 - Maricopa County Superior Court - #11613418 - 5/19/2025 - Sun City Response to Plaintiff's Application for PI	\$6.70
05/19/25	Vendor: Chase Card Services - 5950/7469; Invoice#: 2025036327; Date: 5/19/2025 - Maricopa County Superior Court - #11613497 - 5/19/2025 - Sun City Motion to Exceed Page Limit for Response to App for PI	\$6.70
	<b>TOTAL COSTS AND DISBURSEMENTS:</b>	<b>\$355.85</b>