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7 IN THE SUPERIOR COURT OF ARIZONA

8 IN AND FOR THE COUNTY OF MARICOPA

9
10 THOMAS J. GUSICH, an individual,

11 Plaintiff,

12 vs.

13 SUN CITY GRAND COMMUNITY
14 ASSOCIATION, INC., an Arizona
corporation,

15 Defendant.

Case No. CV2025-002634

**PLAINTIFF'S RESPONSE IN
OPPOSITION TO DEFENDANT'S
APPLICATION FOR ATTORNEYS'
FEES**

(The Honorable Jennifer Ryan-Touhill)

16
17 To try and deter any other member of the Association from challenging
18 Association rules and actions, the Association requests that this Court award over
19 \$353,000 against a retiree, which will financially ruin him. Nothing about that sum
20 or result is reasonable, especially when compared to the less than \$124,000 expended
21 by Plaintiff Tom Gusich for the legal work in this very case. Additional flaws justify
22 denying all or most of the requested fees. First, the applicable attorneys' fees
23 provisions do not justify a requested award for the entire litigation because they
24 apply only to certain types of actions, and/or are discretionary. Second, the
25 Association's complete turnaround regarding A.R.S. § 33-1813 estops it from relying
26 on that statute to demand fees. Third, large portions of the demanded fees are

1 unreasonable and excessive by any analysis given, duplicative work by too many
2 attorneys, at excessive rates, with excessive time spent on tasks. Fourth, and related
3 to the excessive hourly rate sought by the Association, the Association was offered
4 insurance coverage up to \$400 per hour for an attorney to handle this very litigation.
5 Fifth, the application demands \$13,000 in fees for excessive time spent on Tom's
6 independent, statutory demand for documents, which is covered by a statute that
7 only authorizes copy costs.

8 **I. TOM FILED ONE CONTRACT CLAIM AND TWO INDEPENDENT, SEPARATE CLAIMS**
9 **CHALLENGING THE LEGALITY OF BOARD ACTIONS. THE ASSOCIATION**
10 **AVOIDED ANY MERITS LITIGATION OF THE LATTER TWO CLAIMS.**

11 The Association requests that this Court award over \$353,000 against a
12 retiree, claiming that the entire litigation was a breach of contract case, that Tom
13 filed a lawsuit about magic language in voting petitions, and was dilatory. Not true.
14 The truth and record reflect that Tom lodged novel legal issues without precedent,
15 two of which the Association did not successfully defeat on the merits.

16 First, the Association miscasts this litigation to label it frivolous and dilatory.
17 While he was a member of the Board of Directors, Tom filed a Complaint seeking
18 contractual indemnity pursuant to the governing Bylaws as a stand-alone breach of
19 contract claim, and a declaratory judgment finding that the Grand Standards are
20 invalid or unenforceable and that he did qualify for indemnification. (Compl. ¶¶41,
21 46-49)

22 Tom did not voluntarily wait until the eve of a special meeting to file his claims
23 challenging the process followed for his removal from the Board of Directors. Rather,
24 the Association claimed that it was following and applying the A.R.S. § 33-1813
25 petition signature process to recall him from the Board of Directors. Here are
26 captures from the attached paper petition and announcement from the Board, both

1 reciting that the Association was applying and following § 33-1813, which requires a
2 petition with required signatures.

3 **PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH**

4 As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-
181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose
5 of recalling/removing current board of director member, Thomas Gusich.

6 February 10, 2025

7
8 Dear Residents,

9
10 On Friday, February 7th, a petition from a group of residents was received by CAM
11 with 1,190 signatures to recall Director Tom Gusich. Legal counsel has confirmed
12 that more than the minimum of 982 signatures were verified.

13
14 At an Executive Session on Saturday, February 8th, the Board of Directors voted to
15 take the following actions in accordance with ARS 33-1813 and our governing
16 documents:

17
18 [Exh.'s A, B]

19 The Association announced a February 24 recall election, on February 10th.
20 [Exh. B] That provided Tom fourteen days to try and figure out where these alleged
21 petitions with 982 signatures were and whether they were legally sufficient. The
22 alleged signatures were a mystery. Tom had to learn from other residents that the
23 Association was claiming that various emails, regardless of contents or instructions
24 to the message senders, were electronic signatures. (App. for Preliminary Injunction,
25 at 3, 7-11) That prompted the Amended Complaint and Application for Preliminary
26 Injunction challenging noncompliance with A.R.S. § 33-1813.

1 The issue of whether the many different emails received by the Association
2 qualify as electronic signatures, adding up to the requisite number under A.R.S. § 33-
3 1813, has not been examined in Arizona. It is extraordinarily novel. To examine those
4 alleged signatures, Tom issued to the Association a statutory demand for documents,
5 including the petitions and signatures. [Exh. C] After Tom filed his legal challenges,
6 the Association changed tactics, claiming that it does not have to follow A.R.S. § 33-
7 1813 and could remove a Board member without any petition, signatures, or special
8 meeting. (Mot. to Dismiss (“MTD”), at 3, 7-8) Against Tom’s arguments that this
9 resulted in abrogation of § 33-1813, this Court agreed and dismissed that claim. The
10 issues regarding compliance with § 33-1813 remain unexamined.

11 Similarly, the Association did not successfully defend the code of conduct
12 labeled the Grand Standards. It evaded any legal examination of them. The
13 Association argued that Tom lacked standing. (MTD, at 11) This Court agreed and
14 dismissed that claim. That is not a merits-based defense or demonstration of lack of
15 merit for Tom’s legal challenge. *E.g., Sears v. Hull*, 192 Ariz. 65, 68 ¶9 (1998)
16 (refusing to consider the merits of the claim based on lack of standing); *Arreola v.*
17 *Godinez*, 546 F.3d 788, 795 (7th Cir. 2008) (“Standing is a prerequisite to *filing suit*,
18 while the underlying merits of a claim (and the laws governing its resolution)
19 determine whether the plaintiff is *entitled to relief*.”).

20 **II. THE ASSOCIATION WAS OFFERED INSURANCE COVERAGE UP TO \$400 PER**
21 **HOUR TO HANDLE THIS LITIGATION AND REJECTED THAT TO HIRE COUNSEL**
22 **AT THE EXCESSIVE RATES REQUESTED.**

23 The reasonable rates for this type of litigation are outlined below in Section
24 IV. Reflective of those reasonable rates, the Association could have handled this
25 litigation at \$400 per hour. A member of the Board personally informed Tom that
26 the insurance carrier offered to pay for the Association’s legal bills, at a rate of \$400
per hour. [Exh. D] That is consistent with the rates for HOA litigation, including for

1 Tom's counsel. The Association rejected that request and voluntarily incurred the
2 excessive rates of three different counsel that it now requests that this Court award.
3 [*Id.*] This Court should reject those rates, as outlined below and for the basis that
4 the Association should not be allowed to run up a bill as it seeks to do against Tom.

5 **III. THE CITED FEE PROVISIONS DO NOT COMPEL A \$353,000 FEE AWARD.**

6 The Association claims three separate provisions support an award of over
7 \$353,000 of attorneys' fees against a retiree for the entirety of this litigation. None
8 do. The Declaration only compels an award of fees for the claim for indemnification.
9 Arizona's statutory provision for fees for contract actions is discretionary, applies
10 only to the claim for indemnification, and only authorizes reasonable fees. And the
11 Association's conduct in switching its legal position regarding A.R.S. § 33-1813
12 estops it from seeking fees under that provision.

13 **A. Arizona's contract fee statute is discretionary as to issuing an**
14 **award and any awarded amount.**

15 Arizona Revised Statutes § 12-341.01(A) does not mandate or presume an
16 award of attorneys' fees for a contract claim. *Associated Indem. Corp. v. Warner*, 143
17 Ariz. 567, 569 (1985). Section 12-341.01(A) authorizes only a discretionary award of
18 "reasonable" attorneys' fees.

19 Section 12-341.01(B) further grants the court discretion to award less than a
20 party has paid and authorizes the court to grant a lesser amount unrelated to the fee
21 application. "It need not equal or relate to the attorney fees actually paid or
22 contracted" A.R.S. § 12-341.01(B).

23 And, as outlined above, Tom filed only a single contract claim regarding
24 indemnity, which was resolved on pure legal argument.

1 **B. The Association’s belated evasion of A.R.S. § 33-1813 estops its**
2 **reliance on that statute to compel any award of attorneys’ fees.**

3 The Association’s second claim that an award of reasonable attorneys’ fees is
4 mandated by A.R.S. § 33-1813 should be rejected on the basis that the Association
5 asserted it was conducting a recall election based on that statute, and belatedly took
6 the position that it has discretion not to follow that statute. Equitable estoppel bars
7 a party “from asserting rights which might have otherwise existed against another
8 person who in good faith has relied upon the conduct and as a result of such reliance
9 has changed his position for the worse.” *E.g., Heltzel v. Mecham Pontiac*, 152 Ariz.
10 58, 61 (1986). That is the case here.

11 The Association successfully evaded the merits of any § 33-1813 challenge
12 based on this Court’s adoption of the argument that it does not need to follow that
13 statute. (July 9, 2025 Minute Entry, at 8 “[T]he Court need not consider the
14 sufficiency of the signatures”) In contrast, for the removal of Tom from the
15 Board, the Association expressly stated that it was proceeding with a special meeting
16 pursuant to § 33-1813. [Exh’s A, B]

17 Tom relied on the Association’s statements that it was allegedly operating
18 pursuant to § 33-1813 and challenged its actions as deficient. Only when litigation
19 took place did the Association switch course to claim that it did not have to abide by
20 § 33-1813. Against Tom’s reliance on the Association’s stated procedures and his
21 arguments that this result rendered § 33-1813 superfluous and meaningless, this
22 Court adopted the Association’s arguments that removing Tom could be done by any
23 means compliant with instead, Title 10. The Association is estopped from trying to
24 compel fees pursuant to a statute that it told Tom it was relying upon, only to
25 successfully switch course to avoid the merits of that legal challenge.

26 Additionally, that statutory provision applies only to a claim for the removal

1 of a Board member, which was only part of this litigation.

2 **C. The Declaration’s fee provision only applies to the**
3 **indemnification claim.**

4 Last, the Association incorrectly tries to label the entire litigation as tied to
5 the Declaration (contract) as support for awarding all fees, for every argument and
6 every claim. (Fee App., at 4-5) That is wrong. The Declaration compels an award of
7 fees only for “an action instituted *to enforce any of the provisions contained in the*
8 *Governing Documents.*” (Am. Compl. Exh. 1, at 66 (emphasis added)) The vast bulk
9 of the litigation did not seek to enforce a governing document.

10 Tom acknowledges that the claim for indemnity sought to enforce that
11 provision in the governing documents. The other claims, which also were the basis
12 for the Application for Temporary Restraining Order and previously set hearing on
13 the requested injunction, were challenges to the removal of a board member in
14 violation of state statute and adopting a code of conduct that abrogated the fiduciary
15 duties of elected board members and was applied unreasonably. Tom was not seeking
16 to enforce a provision in the governing documents by challenging his removal or a
17 code of conduct.

18 Tom challenged his removal from the Board as a violation of Title 33. (Compl.
19 ¶¶38, 59-64) “This violates Arizona statute” (*Id.*) That statute prohibits reliance
20 on governing documents, specifically the Bylaws. A.R.S. § 33-1813(A). That does not
21 qualify as an action to enforce the governing documents and trigger the fee provision
22 in the Declaration.

23 The Association stretches the filings to try and shoehorn the independent
24 claims into alleged claims to enforce the governing documents and compel their
25 monumental fee request. The Association attempts to argue that because the
26 ByLaws incorporate all state statutes, this transformed Tom’s express statutory

1 claim into enforcement of the governing documents. (Fee App. at 4:21-26) Not so.
2 “[S]tatutes of this state are a part of every contract,” *Skaggs Drug Ctr., Inc. v. U. S.*
3 *Time Corp.*, 101 Ariz. 392, 397 (1966), but that does not transform all statutory
4 claims into contract claims as the Association attempts to argue. For example, just
5 recently, the Court of Appeals vacated a trial court’s award of fees and finding that
6 a claim arose from a homeowners’ association contract. *See Whitmer v. Hilton Casitas*
7 *Homeowners Ass’n*, 1 CA-CV 22-0202, 2023 WL 315328, at *1 ¶1 (App. Jan. 19, 2023).
8 The Court found that the duties litigated all arose solely from statute. *Id.* ¶11. The
9 Court rejected the Association’s request for fees, holding that “even if the Declaration
10 served as the factual predicate for Whitmer’s claims, it was not the essential basis of
11 those claims.”

12 Tom lodged a statutory claim, arguing that the Association could not enforce a
13 bylaw provision that contradicted the statute. “Defendant’s argument that it
14 complied with Title 10 or the Bylaws, in other words, is a red herring.” (Resp. to Mt.
15 to Dismiss, at 10:4-5)

16 Tom challenged the code of conduct as unlawful and unreasonable in
17 application. That was a challenge to the existence and *the Association’s enforcement*
18 of a governing document. That is the exact opposite of Tom seeking to enforce a
19 governing document.

20 The indemnification claim was subject only to the Motion to Dismiss, based on
21 non-novel argument and citation. Any award of fees for that claim should not exceed
22 an award of fifteen hours of work at the billing rate this Court finds reasonable. That
23 is and was the only claim that is subject to the Declaration’s mandatory fees
24 provision.

25

26

1 **IV. IN WHOLE, AND EXAMINED FOR HOURLIES AND TASKS, \$353,000 IS SHOCKING,**
2 **OBVIOUSLY EXCESSIVE, AND NOT REASONABLE.**

3 The Association relies on two fee statutes that allow awards of “reasonable”
4 fees, and the Declaration. Compulsory contractual fee provisions do not authorize
5 clearly excessive fee requests. Under either analysis, the request for \$353,000 is
6 shocking and unwarranted. Tom’s attorneys worked the same case for less than
7 \$124,000. The hourlies requested are excessive for HOA litigation, and include a
8 requested \$455 hourly rate for a first-year associate against the \$385 rate for
9 undersigned counsel whom has over 20 years experience. The tasks were overstaffed
10 and included work by three or four attorneys, resulting in requests such as \$30,000
11 for writing a fee application. The appropriate rate for HOA litigation under any
12 analysis, is \$400 per hour up to \$450 for highly experienced attorneys.

13 In evaluating a requested fee award for reasonableness, courts evaluate much
14 more beyond the contracted hourly fee rate and hours expended. Courts are not
15 bound to find reasonable either the contracted hourly fee or the hours of work
16 performed.

17 Just as the agreed upon billing rate between the parties may be
18 considered unreasonable, likewise, the amount of hours claimed may
19 also be unreasonable. If a particular task takes an attorney an
inordinate amount of time, the losing party ought not be required to pay
for that time.

20 *Schweiger v. China Doll Rest., Inc.*, 138 Ariz. 183, 188 (App. 1983). And courts begin
21 their analysis only by consideration of time that is “reasonably expended” on the
22 litigation. *E.g., Burke v. ASRS*, 206 Ariz. 269, 275 ¶19 (App. 2003).

23 In analyzing a requested fee award for reasonableness, court also analyze
24 many factors, including:

- 25 (1) Whether the unsuccessful party’s claim or defense was meritorious;
26 (2) Whether the litigation could have been avoided or settled and the

1 successful party's efforts were completely superfluous in achieving the
2 result;

- 3 (3) Whether assessing fees against the unsuccessful party would cause an
4 extreme hardship;
- 5 (4) Whether the successful party prevailed with respect to all of the relief
6 sought;
- 7 (5) Whether the legal question presented was novel and whether such claim
8 or defense have previously been adjudicated in this jurisdiction; and
- 9 (6) Whether the award would discourage other parties with tenable claims
10 or defenses from litigating or defending legitimate contract issues for
11 fear of incurring liability for substantial amounts of attorney's fees.

12 *Wagenseller v. Scottsdale Mem'l Hosp.*, 147 Ariz. 370, 394 (1985).

13 Courts additionally analyze how litigation was handled, including whether too
14 many attorneys worked on matters (overstaffing). *Hensley v. Eckerhart*, 461 U.S.
15 424, 434 (1983) (warning against overstaffing and instructing that courts should
16 exclude from the "initial fee calculation hours that were not 'reasonably expended'").
17 Courts also review the hours expended on specific tasks as part of reasonableness.
18 *Id.*

19 Relatedly, when analyzing a mandatory contractual fee provision, courts will
20 not enforce a request that is "obviously excessive." *McDowell Mountain Ranch Cmty.*
21 *Ass'n, Inc. v. Simons*, 216 Ariz. 266, 270 ¶18 (App. 2007). Only when the moving
22 party's requested fees are facially reasonable does the opposing party have a burden
23 to demonstrate that the requested fees are, instead, clearly excessive. *Id.* ¶20.

24 Courts may find and reject the total request as "clearly excessive" in the
25 amount of work performed on tasks, and by comparing the relative work and fees
26 expended by the opposing parties. In *Talking Rock Land, LLC v. Inscription Canyon*
Ranch, LP, 257 Ariz. 267, 270 ¶13 (App. 2024), the Court of Appeals upheld a trial
court's refusal to award a homeowner's association's total requested fee award as

1 clearly excessive. The Court of Appeals upheld two separate analyses performed by
2 the trial court that apply here. First, it upheld the trial court’s findings that specific
3 tasks were excessively performed with no requirement that the trial court identify
4 specific time entries as excessive. *Id.* ¶¶10, 12. Second, the Court of Appeals found
5 that a trial court can find a requested fee award “clearly excessive” by comparing the
6 opposing party’s expended fees as demonstrative of disproportionality or as contrary
7 evidence of the reasonable fee in the community. *Id.* ¶13.

8 **A. An award to an attorney already paid a \$24,000 monthly**
9 **retainer? Including \$13,000, for 26.2 hours’ of .1 time entries, to**
10 **“review” messages?**

11 Telling of the unreasonable and clearly excessive fee request are the entries
12 for attorney Curtis Ekmark. Mr. Ekmark is regularly retained by the Association for
13 general legal services and paid \$24,000 per month regardless of whether any legal
14 tasks are performed. [Exh. C] Thus, there are no such fees incurred that the
15 Association is obligated to pay related to this litigation, and the requested \$34,000
16 for fees from Curtis Ekmark should be rejected. Yet, in spite of already paying
17 through a retainer, the Association demands payment of \$34,000 for this work, which
18 includes unreasonable amounts and excessive task entries.

19 Attached at Exhibit F2¹ are just the .1 time entries for Mr. Ekmark. The
20 Association has demanded an award of \$12,969 for 26.2 hours’ worth of .1 time
21 entries for Mr. Ekmark for review or reading of emails. Where most attorneys write
22 off such entries, the Association instead is requesting that this Court impose against
23 Tom \$12,969 for a compilation of tasks that may only be amounting to a few seconds.
24 One entry on November 20, 2024 is particularly telling: “Reviewed email from board
25 member regarding mediation outcomes.” The parties never mediated. Here are more

26 ¹ The conversion of the Association’s documents into Excel created strikethrough font
on several entries that is not copied from the originals.

1 illustrations of how these very brief entries, that may be acts conducted in seconds,
2 are being used to add up to this, again, request to impose \$13,000 against Tom:

3 1/26/2025: "Reviewed text from board president and drafted response." (0.1)

4 11/13/2024: "Reviewed email from Board Member regarding Tom." (0.1)

5 5/22/2025: "Drafted text to litigation counsel regarding hearing and reviewed response."
6 (0.1)

7 5/22/2025: "Reviewed text from litigation counsel and drafted response regarding
8 executive sessions." (0.1)

9 5/28/2025: "Reviewed order in Tom's case" (0.1)

10 4/29/2025: "Reviewed email to litigation counsel" (0.1)

11
12 [Exh. F2]

13 **B. \$15,000 to provide documents pursuant to a compulsory statute**
14 **that authorizes only copy costs is unsupported, unreasonable,**
and clearly excessive.

15 The statutory provisions for homeowners' association members grant them the
16 right to inspect and receive copies of the Association documents. A.R.S. § 33-1805(A).
17 That statute authorizes only the charging of copy costs. *Id.* On March 6, 2025, Tom
18 sent a statutory demand for the various Association documents that related to this
19 litigation such as petitions, signatures, and emails. [Exh. C]

20 Section 33-1805 compelled that document production regardless of the
21 litigation. It does not contain any provision for attorneys' fees. Yet, the fee
22 application requests an award of \$14,929 for 27 hours spent reviewing documents in
23 response to that request, by four separate attorneys. Those entries of time are
24 attached at Exhibit F1. There is no legal support for awarding fees for that and it
25 must be struck. But the request illustrates the endemic problem with the entire fee
26 application. It should not take four attorneys 27 hours to collect and produce

1 documents.

2 **C. Billing for up to five separate attorneys charging \$470 to \$620**
3 **per hour for related tasks is unreasonable and clearly excessive.**

4 In addition to accounting for the correct application and rejection of the cited
5 attorneys' fees provisions, there are three separate grounds for rejecting some or all
6 of the requested fees as unreasonable or clearly excessive. First, the hourly rates
7 charged are excessive. Second, the tasks were overstaffed with attorneys charging
8 those excessive rates. Third, many tasks were excessively worked.

9 Courts reviewing the hourly rates review the rate for attorneys in the relevant
10 community performing "similar work." *State ex rel. Corbin v. Tocco*, 173 Ariz. 587,
11 590 (App. 1992). Courts are not bound by contracted attorney hourly rates, and may
12 reduce the hourly rate requested upon receipt of a contravening affidavit
13 demonstrating the appropriate rate for that work. Additionally, courts faced with
14 excessive fee award requests exercise discretion to reduce the hourly rates to those
15 agreed to with insurance carriers. *Medifast, Inc. v. Minkow*, 10-CV-382-CAB (MDD),
16 2015 WL 13827934, at *2 (S.D. Cal. Mar. 24, 2015) ("[I]n light of the very large
17 amount of hours billed, the court finds it reasonable to award fees at the rates
18 Coenen's counsel billed her insurance carrier, rather than the higher rates counsel
19 request.").

20 **1. The fee application includes excessive rates for this**
21 **litigation.**

22 The provided billing entries reflect that the Association contracted to pay
23 Ms. Stine and Mr. Roberts \$620 per hour, and a 2024 law school graduate \$455 per
24 hour. The Association included even more, with claims that it agreed to pay separate
25 counsel \$495 per hour (omitting that he was already paid a monthly retainer) and
26

1 his associate, a 2020 law school graduate \$470 per hour.²

2 In contrast, the undersigned counsel, a twenty-plus-year attorney, and
3 Jonathan Dessauls, also a twenty-plus-year attorney and the separate owner of this
4 firm, charged \$385 and \$450 per hour, respectively. Work performed by Joe Halow,
5 a law school graduate awaiting bar licensure, was billed at \$225. [Exh. G] The rates
6 charged are consistent with the work performed for HOA law. Attached at Exhibit
7 E is the Declaration of Kevin Harper, an equally experienced law firm partner who
8 practices primarily HOA law. He bills at \$400 hourly and considers any billing in
9 this field by an experienced HOA partner above \$500 to be excessive. Equally
10 reflective of the reasonable rate, the Association's carrier offered to cover the legal
11 billing at \$400 per hour. The Association rejected that and voluntarily sought counsel
12 at higher rates. [Exh. D]

13 There is a very telling demonstration that the Association's demanded
14 \$353,000 fee award is both unreasonable and clearly excessive. Tom's attorneys
15 prepared for the same hearings, oral arguments, and drafting. As demonstrated in
16 the attached declarations of undersigned counsel and time entries, this work was
17 performed for almost 1/3 the cost, less than \$124,000. [Exh. G] This drastic
18 disproportionality between charged fees demonstrates that the \$353,000 request is
19 clearly excessive, and that the billing rates are not reasonable, such that this Court
20 should reduce those requested hourly fees for any awarded work (in addition to a
21 reduction for the duplication of work). That \$124,000 reflects reasonable rates,
22 consistent with what the Association could have incurred utilizing its insurance
23 coverage. That should be adopted as a cap to the Association's fee application.

24 In fact, without even deducting any of the time spent on tasks that are
25 duplicative or not awardable, the entire Quarles & Brady bill would amount to

26 ² <https://www.linkedin.com/in/courtney-pecor-a3401a106/>.

1 \$196,300 if each attorney's rates were adjusted to the \$400 that the Association's
2 carrier offered to cover. \$400 would still be an excessive rate for a first-year associate.
3 Thus, correcting for a \$325 hourly for Mr. Contrera would bring their entire bill in
4 at a total of \$184,629.50.

5 **2. \$33,000 to write a fee application? Numerous tasks were**
6 **excessively staffed and billed.**

7 Examination of the tasks performed demonstrates overstaffing of tasks and
8 excessive time expended. This starts with the Association's fee application itself.
9 These are standard filings. Attached at Exhibit F5 are the time and fee entries for
10 working on that document. The Association requests \$32,908.50 for creating that,
11 again, standard document. Four attorneys worked on that document for a total of
12 54.3 hours. That is excessive and unreasonable in time expended, staffing, and
13 hourly rates, and should be rejected entirely or reduced to no more than \$12,000.

14 But that request is typical of the problems with the fee application.

15 Attached at Exhibit F8 are the application entries demonstrating the billing
16 for more than 100 hours of work responding to the requested TRO and Preliminary
17 Injunction, by four attorneys, for \$62,138.50. That is excessive in time expended,
18 staffing, and hourly rates, and should be substantially cut in addition to a rate
19 reduction.

20 The application includes billing for four attorneys' generic entries, such as
21 attending meetings with each other ("conferring") for 76.8 hours, and a total of
22 \$42,316. That duplicative and unexplained work should be cut to no more than 38
23 hours at a rate of \$400. *Reyes v. Bakery & Confectionery Union & Indus. Int'l Pension*
24 *Fund*, 281 F. Supp. 3d 833, 854 (N.D. Cal. 2017) (acknowledging that some meetings
25 are necessary, but heavily discounting such conferences as "excessive").
26

1 The application includes billing for four attorneys to work on the Motion to
2 Dismiss and the Reply in support. The entries for that work are attached at Exhibits
3 F6 and F7. To the extent that there is any award for that work, the hourly rate for
4 Ms. Stine and Mr. Roberts should be reduced to \$400 and there should be no award
5 to include the additional staffing of Mr. Contrera and Mr. Ekmark as unnecessary.

6 **B. The requested fee award would be financially ruinous.**

7 As part of review for reasonableness and excessiveness, courts consider
8 whether the request would work an extreme hardship on the unsuccessful party.
9 *Wagenseller*, 147 Ariz. at 394. Tom's financial position, especially compared to the
10 Association, heavily supports rejecting the fee request or capping the request at
11 \$124,000.

12 The Association has, at the very least, over \$26 million in reserve funds to
13 cover unforeseen expenses such as those incurred in this lawsuit. [Exh. D] The
14 Association budgets for more than \$300,000 to cover professional services. [*Id.*] In
15 contrast, Tom's assets currently consist of IRA accounts totaling slightly over
16 \$300,000, a half share on a residence amounting to roughly \$325,000 with an
17 outstanding mortgage balance of \$145,500. [*Id.*] Tom has an emergency reserve of
18 roughly \$20,000 in liquid savings for discretionary spending. [*Id.*] He pulls a
19 combined \$5,027 from his IRAs and Social Security distributions while incurring
20 roughly \$3,600 in expenses every month. [*Id.*]

21 Beyond this disparity, the Declaration would work a unique hardship with any
22 fee award. The Declaration provides that awarded "attorneys' fees and costs shall be
23 a Benefited Assessment with respect to the Lot(s) involved in the action." (Am.
24 Compl. Exh. 1, at 66) The Association would apply that amount against Tom's home
25 ownership interest. Thus, Tom's limited home ownership interest would be destroyed
26 by granting the Association's request.

1 **V. CONCLUSION.**

2 There is only one compulsory fee provision, the Declaration. That applies only
3 to the breach of contract claim for indemnification. The proper fee award for that
4 work should be \$6,000 (15 hours' work x \$400 per hour). This Court should reject the
5 Association's reliance on § 33-1318 based on equitable estoppel and refuse to award
6 any fees for the vast bulk of the request, which related to that challenge.

7 If this Court awards fees for more of this litigation, there are voluminous
8 chunks in the fee request not supported or excessive by several measures. Upon
9 review of what is appropriate hourly fees for HOA litigation, the excessive time spent
10 on tasks, and the duplicative entries, any fee award for the Association should not
11 exceed the \$124,000 expended by Tom's attorneys at the standard community rates,
12 for this very litigation.

13 DATED this 20th day of August 2025.

14 DESSAULES LAW GROUP

15 By: /s/ David E. Wood
16 Jonathan A. Dessaulles
17 David E. Wood
Attorneys for Plaintiff

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1 ORIGINAL of the foregoing e-filed
2 this 20th day of August 2025 with:

3 Clerk of the Court
4 Maricopa County Superior Court
5 www.turbocourt.com

6 COPY of the foregoing document eserved and
7 emailed this 20th day of August 2025 to:

8 Lauren Elliot Stine
9 Daniel G. Roberts
10 QUARLES & BRADY, LLP
11 One Renaissance Square
12 Two North Central Avenue, Suite 600
13 Phoenix, Arizona 85004
14 Lauren.Stine@quarles.com
15 Daniel.Roberts@quarles.com
16 *Attorneys for Defendant*

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26
/s/ Hilary Narveson

EXHIBIT A

(1)

PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. Amyson Cuine	<i>Amyson Cuine</i>	18598 N. Red Mountain Way	
2. Roberta Backus	<i>Roberta Backus</i>	16057 Sun Prairie Court	
3. Annette Bickel	<i>Annette Bickel</i>	16178 W Montoya Dr	1012590
4. Barbara Pier	<i>Barbara Pier</i>	15580 W. Vista Grande Ln	
5. Margo Ragnini	<i>Margo Ragnini</i>	19662 N. Cobblestone Ct	
6. ^{may have done this} Linda Abate	<i>Linda Abate</i>	15418 W. Echo Canyon Dr	0059581
7. Nancy Spata	<i>Nancy Spata</i>	18840 N. Diamond Dr	0063150
8. Susan Kreny	<i>Susan Kreny</i>	15416 W. Camino Estrella Dr.	0064260
9. Mary Lou Lu	<i>Mary Lou Lu</i>	18912 N Hawthorn Dr	
10. Karen L Lowry	<i>Karen L Lowry</i>	15746 West Star View Ln.	

(Signature)

PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

	Print Name	Signature	Address	CAM #
1.	Carlyle Smith	<i>Carlyle Smith</i>	16199 W Emerald Ridge Dr	0026180
2.	Richard Jaeger	<i>Richard Jaeger</i>	19747 N Wind Rose Way	0019230
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Jan Finatri	<i>Jan Finatri</i>	18170 N. Sterling Dr.	5502-000
2. NANCY HERR	<i>Nancy Herr</i>	19809 N. VALENCIA COURT	1856-000
3. DONNA GROPP	<i>Donna Gropp</i>	20126 N. Shadow Mountain Dr	1734-001
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. MELISSA NEWBIGGIN	Melissa Newbiggin	17624 N OAKMONT CT	5392-001
2. SANDY HUNTER	S Hunter	15838 W. JOSHUA TR. DR.	1843-000
3. Jean Peterson	Jean Peterson	21002 N Vista Tr	0426-001 8538
4. Ruth Whitney Parker	Ruth Whitney Parker	18303 N. Sterling Dr	1001571
5. Judy Swan	Judy Swan	16524 W Pueblo Ln.	0001911
6. Jackie Korevec	J Korevec	20948 N. Vista Tr	00180-01
7. Steve Zibre	Steve Zibre	21016 N. Gold Poppy Ln	00932.5-0
8. Bea Dell-Shepherd	Bea Dell-Shepherd	15418 W. Miramonte Ct	1009920
9. Kris Koch	Kris Koch	19759 N Desert Song Way	
10. Sharon Kolstad	Sharon Kolstad	20176 N Saguro Ct	0065920

7

PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. Dorothy Reid	<i>Dorothy Reid</i>	18984 N Hawthorn Dr	1002421
2. Becky Iles	<i>Becky Iles</i>	16142 W Montoya Dr	1006108
3. Debi Henning	<i>Debi Henning</i>	16912 W. Villagio	0041631
4. GAY OBLACK	<i>Gay Oblack</i>	15222 W Wildfire	1008000
5. BILL PELINSKI	<i>Bill Pelinski</i>	18544 N. AVALON LN.	1001000
6. DONALD BURNETT	<i>Donald Burnett</i>	15229 W wildfire Dr	0059811
7. Karen Graves	<i>Karen Graves</i>	19814 N Winterlawn Ln	0011691
8. LYNN MAYER	<i>Lynn Mayer</i>	18602 N. Twilight Way	0017326
9. Araloben	<i>Araloben</i>	15223 W. Wildfire	0059401
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. MARTHA HUTTON	<i>Martha Hutton</i>	16319 W. Bonita Park Dr.	0005831
2. KAREN S WINTERS	<i>Karen S. Winters</i>	18514 N. Sarsay Ct.	5945-000
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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Print Name	Signature	Address	CAM #
1. JIM WARD	<i>J Ward</i>	19135 N, CATHEDRAL PT. CT.	9736
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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Print Name	Signature	Address	CAM #
1. Elaine Palchinski	<i>Elaine Palchinski</i>	20461 N. Desert Sky Ln	0022252
2. Sally Seidner	<i>Sally Seidner</i>	20460 N. Madenridge	0016601
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<i>Print Name</i>	<i>Signature</i>	<i>Address</i>	<i>CAM #</i>
1. Mary Burns-Kules	<i>Mary Burns-Kules</i>	19820 N Shadow Mtn Dr	1985-001
2. Andrea Eisenberg	<i>Andrea Eisenberg</i>	18304 N. Key Estrella	2998-001
3. Nancy Fradin	<i>Nancy Fradin</i>	20040 N. Hearthstone Dr.	2158 001
4. LeVonne Liversage	<i>LeVonne Liversage</i>	18280 N Las Pecos Way	1002678
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH


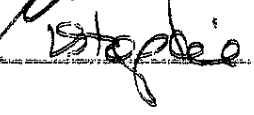
As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. <u>Tom Rohan</u>	<u>[Signature]</u>	<u>20434 N Cactus Enderly</u>	<u>1000340</u>
2. <u>Rebecca Good</u>	<u>[Signature]</u>	<u>14989 W. Angel Basin way</u>	<u>0064400</u>
3. <u>WARREN QUINLAN</u>	<u>[Signature]</u>	<u>19866 N TAPESTRY LT</u>	<u>4948-001</u>
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

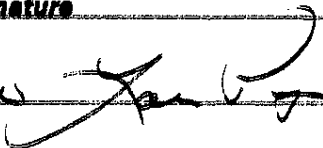
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<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM#</u>
1. John Papogi		15702 W Lindenview	1008390
2. Lexi Pearson-Stopke		19748 W Hidden Ridge Dr	1006470
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Lou Provencano		19271 N. Canyon View Dr.	0085270
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. LORRAINE Bensen	LORRAINE Bensen	Surprise AZ 20449 N Shadow Mt Dr	0063481 2872-000
2. Susan & Mary McDonald	Susan & Mary McDonald	SUSAN McDonald 20455 N. Shadow Mt Dr	0503-00
3. Judy Buckingham	Judy Buckingham	20609 Canyon Whisper Dr	
4. Janet Berry	Janet Berry	16922 W. Cortaro Point Dr.	8927-001
5. Louise Kelln	Louise Kelln	16108 W Copper Crest Ln.	0095910
6. Judy LaVelle	Judy LaVelle	16145 W Cortaro Point Dr.	0095451
7. Anh Beubrook	Anh Beubrook	623-209-4920 16728 W. Oracle Nimm Dr	094831
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. Lynne Gallagher	Lynne Gallagher	16987 W. Artesia Dr	0076501
2. Sharon McCloskey	Sharon McCloskey	20550 N. Saratoga Way	00512801
3. LaRayne Hutchins	LaRayne Hutchins	12549 N. Somerset	0046911
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Leslie Gabehart	Leslie Gabehart	15153 W Cypress Point Dr.	6378-001
2. CHRISTINE GAARE	Christine Gaare	15832 W. Joshua Tree Drive	1394-001
3. Ruth Reynolds	Ruth Reynolds	20211 N Sojourner Dr	0173-04
4. Deborah Sidor	Deb Sidor	17717 N. Estrella Vista DR	5446-0501
5. Karen Warberg	Karen Warberg	16506 W. Desert Wreath	2776-001
6. Jim Donaldson	Jim Donaldson	16932 W LINKS DR	0877170
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

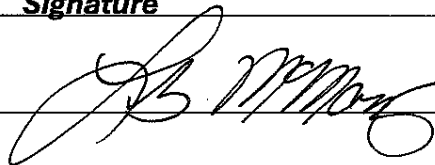
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Print Name	Signature	Address	CAM #
1. SUSAN KAMKE	<i>Susan Kamke</i>	18138 N. Sterling Dr.	050330
2. Godi Edlin		14250 W. Pantano Dr.	0040541
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. Cindy Memanus		12520 W Coral Pointe Rd	1004481
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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Print Name	Signature	Address	CAM #
1. Lorraine Schulz	<i>Lorraine Schulz</i>	20138N. Howe Trail Dr.	0075241
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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Print Name	Signature	Address	CAM #
1. Kathy Kearney	<i>K Kearney</i>		006501
2. Judith Huntsinger	<i>Judith Huntsinger</i>		0027831
3. Judy Pratt	<i>J Pratt</i>		0085531
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. Shirley Mays	Shirley Mays	170 58 ⁴⁸ W Lusk Dr.	0078571
2. Joanne Steinman	Joanne Steinman	20016 N Cielo Ct	1223-001
3. Joanne Steinman	Joanne Steinman	16871 W Greenbriar Pt Ct	0019201
4. Catherine Barton	Catherine Barton	16112 W Galleria Lane 85374	85374 3549-001
5. Eugene Kuebler	Eugene Kuebler	15531 W Oakridge Ct	5824-000
6. PHILL ROBBIUS	Phil Robbius	15917 W LA PALOMA DR	2634-000
7. KAY SCHUMANN	Kay Schumann	19413 N. GUARDIAN LN	0096201
8. Judy Baker	Judy Baker	17519 W. Kartchner Ct	85384 0080140
9. EDWARD STARIC	Edward Staric	19051 N ALAMEDA DR	7837-000
10. Linda Hernandez	Linda Hernandez	17504 W. Kartchner Ct	85384 8944-0001

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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. Margaret Nelson	M. Nelson	20157 20157 N Sageleaf Ct	0013401
2. Heidi Yewman	Heidi Yewman	15825 W. Silver Breeze Dr.	1623 -001
3. DIANE PALLEY	Diane Palley	20066 N Shadow Mtn	0023553
4. GERARD HARPT	Gerard K Harpt	16045 WEST ADIRONDACK DRIVE	0039690
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. MARY ERICKSON	Mary Erickson	15574 W. Coral Pt DR	0022450
2. JACQUELINE BUIER	Jacquie Buiar	15571 W. Coral Pt Dr.	0037920
3. Patricia Johnson	Patricia Johnson	15572 W Coral Pt Dr	0014881
4. Sandy Layman	Sandy Layman	15507 W. Coral Pointe Dr	1006330
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member. Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Emmet Kuitz	<i>Emmet Kuitz</i>	17209 W Monarch Way	0072680
2. Janet TARR	<i>Janet Tarr</i>	17252 N. POTOMAC LN	0043711
3. Jeetta Hatfield	<i>Jeetta Hatfield</i>	16669 W. Tranquility Dr	0000000
4. Sandra Oberg	<i>Sandra Oberg</i>	19118 N. Diamante Dr	0070361
5. Jo Whitten	<i>Jo Whitten</i>	15131 Alegria Ct	6741
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Susan H. Noe	<i>[Signature]</i>	18601 N. ESCADA CT	7499-000
2. Sharon Hofeditz	<i>[Signature]</i>	17461 Calistoga Dr.	8501-001
3. Debra Delegrin	<i>[Signature]</i>	21292 N Mariposa Grove Ln	0005961
4. Brenda Jewson	<i>[Signature]</i>	15643 W Desert Crown	4689-002
5. Kathy Ginsbach	<i>[Signature]</i>	15844 W. Star View Ln.	0046961
6. Diane Spall	<i>[Signature]</i>	15864 W Arrowhead Dr.	0064971
7. Sandra Lightwine	<i>[Signature]</i>	14961 W Walking Stick Way	0073221
8. Pat Krueger	<i>[Signature]</i>	20142 N. Cactus Forest Dr.	0097001
9. Thom Hughtart	<i>[Signature]</i>	16599 W Desert Willow Dr	0093680
10. Lesley Cowles	<i>[Signature]</i>	17118 W Red Cliff Dr	85387 0008186

THOM HUGHTART

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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1.	<i>Nancy Snider</i>	<i>15952 W Palm Lane</i>	
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name _____ **Signature** _____ **Address** _____ **CAM #** _____

1. Rosalind Mosher Rosalind Mosher 19976 N Window Rock Dr 1036-000

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PETITION TO RECALL BOARD MEMBER THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
JANE BARRY	Jane Barry	15343 W SKYVIEW WAY	0015861
PATTY RODEMAN	Patty Rodeman	18015 W. Emelita Ct.	0053291
NANCY BARKUS	nancyBarkus	15424 W MOONLIGHT WAY	0012641
IAN LINTON		19204 N CATHEDRAL Pt Ct 85367	9641-060
LINDA INNECKEN	Linda Innecken	15351 W Skyview Way 85374	0021941

12-2-2024 Sent electronically to email @

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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. JANET ALLEN	<i>Janet Allen</i>	1000 N. ...	00000001
2. LESLIE ANDREWS	<i>Leslie Andrews</i>	19231 N TIMBER RIDGE DR	0047480
3. LIZ DOWD	<i>Liz Dowd</i>	19015 N Moorbank Ln	00800001
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

All members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-101.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name

Signature

Address

CAM #

Steve Jacobsen

John Sawlson

15267 W. Morningtree Dr

0073660

1. Louise Danskin

Louise Danskin

15278 W. Morningtree Dr

0054091

2. Dave Danskin

Dave Danskin

15278 W. Morningtree Dr.

0054090

3. Jim Cornell

J Cornell

20859 N VISTA TRL

0094660

4. Margaret Bussey

Margaret Bussey

15262 W Morningtree Dr

2776

5. Geneva Krinner

Geneva Krinner

18532 N. AVALON Ln

0058140

6. Vicki Bonstrom

V Bonstrom

16402 W Deseret Ave

0022441

7. Fossie Orneck

Rachel Orneck

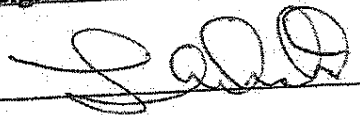
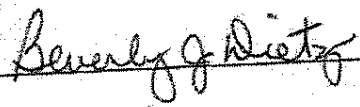
18806 N Borgata Drive

0016693

50

PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. LINDA A. ONSTAD		19737 N. Rim Dr	059860
2. ARNOLD + ANITA FERBERKSEN	20043 N. Golden Breeze	007129	
3. Beverly J Dietz		16262 W. Sardinia Pk Dr.	0056130
4. Francaie A. Chough	19733 N. Rim Drive	85374	
5. Henry J. Struwing	19729 N. Rim Dr.	85374	
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM#
1. JANET EYERSMAN	J Eversman	15514 W. LANTANA WAY	0036161
2. Phyllis RANZINGER	Phyllis Ranzinger	15762 W. Kink Drive	0051731
3. Susan Miller	Susan Miller	15570 W. Coral Pink Dr	006239
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

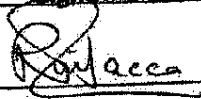
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Print Name	Signature	Address	CAM #
1. J Michelle Hansen	<i>J Michelle Hansen</i>	20823 N VISTA TRAIL	0094001
2. Carol Dadd	<i>Carol Dadd</i>	16849 W. Village Dr.	7519-001
3. SUSAN H. MORAWE	<i>Susan H. Morawe</i>	18611 N. ESCROW CT	7499-100
4. MARLENE FEKETE	<i>Marlene Fekete</i>	15848 W Sage Tr	0047-101
5. Alice Watkins	<i>Alice Watkins</i>	19808 N Shadow Ln	0044941
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM#
1. Raif Zacca		18537 W. Villa Bella Dr.	0048890
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM#
1. Mike Becker	Mike Becker	15238 Arambury	0065960
2. Robert Weber	Robert Weber	15467 W Arbor Tr.	0051000
3. Deborah Williams	Deb Williams	16502 Flora Ln	0097601
4. Debbie Kreutzer	Debbie Kreutzer	15953/1 J Kimo Dr	0025090
5. Martha Taggett	Martha Taggett	15122 W. Home Run Dr	0073341
6. Karin Jones	Karin Jones	20332 N Cactus Garden Trail	0085520 0085520
7. Judy Burggraaf	Judy Burggraaf	17833 N. Bridle Ln.	0029671
8. Mary L Ernest	Mary L Ernest	19739 N Tolby Cr Lt	0079351
9. Earlene Crocker	Earlene Crocker	16526 Rock Springs	008964
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<i>Print Name</i>	<i>Signature</i>	<i>Address</i>	<i>CAM#0074920</i>
1. Joseph Natale	<i>J. Natale</i>	16969 W Arteria Dr Surprise AZ 85387	
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1.	<i>Mick Strandberg</i>	16164 Coper Point La.	0047240
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PETITION TO RECALL BOARD MEMBER THOMAS GUSICH

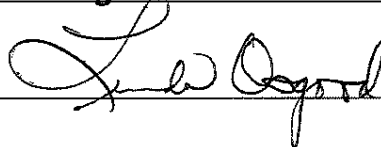
As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-161.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM#
1. Linda Herington	[Signature]	19609 N. Papago Dr	0032471
2. GARY FEE	[Signature]	14959 W. Muirfield LN	0026320
3. Claudia Chase	[Signature]	18417 N Avalon Ln	0056310
4. Cynthia Mason	[Signature]	20423 N Kino Dr	0044840
5. John Hardy	[Signature]	19611 N. Papago Dr.	002393-0
6. Sherl Hiniker	[Signature]	19854 N. Echo Run Dr	0099101
7. Roge Smith	[Signature]	17276 N Potomac Ln	0049580
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

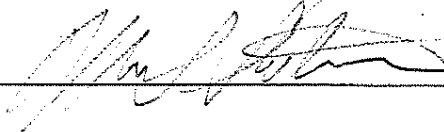
As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. L. M. D. S. G. S. D.		151126 W Clean Canyon Dr	0020831
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. MARK STATHAM		15782 W LA PALM	0019331
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. Sharon Neff	<i>Sharon Neff</i>	2501 N Canyon Whisper Dr	6092280
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Patricia Badsgard	Patricia Badsgard	20605 N. Sequoia Blvd. #1	0001357
2. Dr. Kathryn Ranscher	Kathryn Ranscher	15868 W. Linksvlew Dr.	4755-000
3. Dr. Tony Mullozy Jr.	Tony Mullozy Jr.	16916 W. Links Dr. Surprise AZ	007101
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. GARRY R. HAWKINS	<i>Garry R. Hawkins</i>	1854 Sterling Dr N, Surprise, AZ	0053480
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Judy Tilton	Judy Tilton	16225 Red Rock dr.	1008471
2. YVONNE BOTZ	Yvonne Botz	17571 N Saddle Ridge Dr	0037081
3. Kerice Nolan	Kerice Nolan	14966 W MUIRFIELD LN	72991
4. Lisa Minton	Lisa Minton	14950 W. Mtn View Blvd #7211	7072111
5. Brian Marx	Brian Marx	14950 W Mtn View Blvd	1012010
6. Janet Bonnar	Janet Bonnar	10115 West Copper Crest Ln	1004820
7. Laura Abraham	Laura Abraham	21264 Red Hills Rd	0093551
8. PATTI JONES	Patti Jones	15437 W. SKYVIEW WAY	0015070
9. HEIDI ROBERTSON PYLE	Heidi Pyle	15534 W AGUA LINDA	0058131
10. LINDA Harmon	Linda Harmon	14976 W. Copperstown Way	00704501

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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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Print Name	Signature	Address	CAM #
1. Richard Dye	Richard H Dye	18306 Lakeside Way	9920-000
2. Evelyn Williams	Evelyn Williams	19479 Old Marble Canyon Court	25001
3. W B W DAVID B DICK	W B W	18338 N GILA SPRINGS DR.	6057
4. Wanda	Wanda Burton	18129 N. Petrified Forest Dr	3475
5. Kathryn	Kathryn Tupper	15338 W. Camino Estrella	4128
6. Janet	Janet Wear	16362 N Wild Mustang drive	0222
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<i>Print Name</i>	<i>Signature</i>	<i>Address</i>	<i>CAM #</i>
1. BILLIE J. CAMERON	<i>Billie J. Cameron</i>	16255 W. Boulder Dr	1025831
2. Monica M. Senkbeil	<i>Monica M. Senkbeil</i>	19360 N. Coronado Ridge Dr	8517-001
3. Lynn M. Demming	<i>Lynn M. Demming</i>	19074 N. Aztec Dr	0076310 2052-087
4. Anne Nordstrom	<i>Anne Nordstrom</i>	19850 N. Shadow Mtn	85374 1084-000
5. Janet Hunter	<i>Janet Hunter</i>	15629 W Grand Creek LA	Surprise AZ 85394
6. Ann LaPorte	<i>Ann LaPorte</i>	18947 N. Hiawatha	0077701
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51

PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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- | Print Name | Signature | Address | CAM # |
|---------------------------|--------------------|--------------------------|---------------------|
| 1. Michelle Hansen | <i>[Signature]</i> | 20823 N VISTA TRAIL | 0094001 |
| 2. Eric Hendrix | <i>[Signature]</i> | 17227 W. Cordova Ct | 00485900 |
| 3. Jean Zeidler | <i>[Signature]</i> | 18669 N. LARIAT CT. | 85387 |
| 4. Debbie Hill | <i>[Signature]</i> | 17773 W Parra Dr. | 1003620 |
| 5. John Ribyl | <i>[Signature]</i> | 16401 Wuna Noche Ct | 0032920 |
| 6. Terry Shields | <i>[Signature]</i> | 17773 W Parra Dr | 1003621 |
| 7. Gayle Votaw | <i>[Signature]</i> | 18746 N SUNSITES DR | 0076911 |
| 8. NANCY L. ENGARD | <i>[Signature]</i> | 19750 N DESERT SONG WAY | 0017330 |
| 9. Nancy S. Judge | <i>[Signature]</i> | 15707 W Patagonia Way | 0020921 |
| 10. Bea Schlander | <i>[Signature]</i> | 20110 N Golden Barrel Dr | |
| 11. Reva Litt | <i>[Signature]</i> | 17353 W Imperial Ln | 0071671 |

HUSBAND

52

PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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Print Name	Signature	Address	CAM #
1. Rebecca Alexander	<i>[Signature]</i>	15328 W. Cimarron Dr.	0071801
2. BARBARA ROSEN	<i>[Signature]</i>	16607 W Terrance Road	0098332
3. Cynthia Swintek	<i>[Signature]</i>	20453 N. Madera Way	006045-1
4. Cynthia Wright	<i>[Signature]</i>	18330 N WILD MUSTANG	0028271
5. Patricia Brown	<i>[Signature]</i>	17830 N. Havasupai Dr.	0050021
6. Nancy Gregg	<i>[Signature]</i>	16262 W Starry Sky Dr.	0030361
7. Theresa [Signature]	<i>[Signature]</i>	15164 Daybreak dr.	0068370
8. Monique Speer	<i>[Signature]</i>	19963 Golden Barrel Dr	1010931
9. LESTIE FRIEDMAN	<i>[Signature]</i>	16564 W. Wild Horse Way	85387 000644
10. Sigmond Falk	<i>[Signature]</i>	15870 Clearwater Way	85374 0248121

EMAILED

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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Crystal Colglazier	<i>Crystal Colglazier</i>	16180W. Desert Wind Dr Surprise	0028751
2. MICHAEL DAWSON	<i>[Signature]</i>	16465 W. DESERT STONE LN Surprise AZ	3605-00
3. Jim Walker	<i>[Signature]</i>	17963 N. Peppercorn Ln. Surprise, AZ	0042370
4. Bonnie Walker	[Signature]		
5. THOMAS WEACH	<i>[Signature]</i>	16455 W Desert Stone dr	100270
6. Ronald V. BEEC	<i>[Signature]</i>	15825 W. Joshua Tree Surprise AZ	86374 001170
7. Bonnie Chappell Long	<i>Bonnie M Chappell Long</i>	18414 N Hibiscus Ln Surprise AZ	85374 0067760
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. John Val Hollands	<i>John Val Hollands</i>	15543 W. CYPRESS POINT DR	0014110
2. SKIP HOPPER	<i>Ronald W Hopper</i>	15622 W CYPRESS POINT DR.	0046770
3. John Hansen	<i>John Hansen</i>	15544 W. St Andrews Wy Surprise, AZ 85347	1005320
4. Stephen Andes	<i>Stephen Andes</i>	15505 W. St Andrews Way Surprise, AZ, 85374	
5. Alex Volz	<i>Alex Volz</i>	15479 W. Cypress Pt. Surprise, AZ 85374	0026760
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Clay Stephens	<i>[Signature]</i>	15442 W. Miramonte Ct	0079010
2. MARYAONE FILERI	<i>[Signature]</i>	15524 W. ...	0054983
3. Bill Baran	<i>[Signature]</i>	15409 W. Miramonte	0066900
4. Marilyn Lyda	<i>[Signature]</i>	15396 W. Summerwind Dr	7591-001
5. DIANE CHANEY	<i>[Signature]</i>	15425 W. MIRAMONTE Ct	00067311
6. Robert Reichen	<i>[Signature]</i>	15875 W. Hacienda Ct	0060921
7. Jim Cottrill	<i>[Signature]</i>	15108 W. ...	0062311
8. Marsha Rippeth Hall	<i>[Signature]</i>	15757 W. Cimarron Dr	0060791
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Myrna Padlogar	<i>Myrna Padlogar</i>	19937 N. Halkman Dr	0010210
2. Dee Engleking	<i>Dee Engleking</i>	16372 W. Quarry Ct Surprise	0034931
3. Jan Dondlinger	<i>Jan Dondlinger</i>	16451 W. Boulder Vista Dr	1005949
4. CHERYL JOHANSEN	<i>Cheryl Johansen</i>	16412 W Quarry Ct	1101821
5. Allen Jacobs	<i>Allen Jacobs</i>	17414 N. Horseshoe Dr.	1005300
6. LeAnn Werve	<i>LeAnn Werve</i>	17603 N. Last Mine Lane	1009488
7. Michele Burton	<i>Michele Burton</i>	17420 N. Horseshoe Dr	0032553
8. Carolyn Jay	<i>Carolyn Jay</i>	16297 - W Limestone DR	0039201
9. Barbara J Bollinger	<i>Barbara J Bollinger</i>	16452 W Quarry Ct.	4770-001
10. Betty Phillips	<i>Betty Phillips</i>	16442 W. Quarry Ct	0035951

PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Paula Wilson	<i>Paula Wilson</i>	17827 W. Parra Dr	Surprise 008000 0081201
2. LARRY REAFIELD	<i>Larry Reafield</i>	251 15887 W. Clearcreek Dr	0011590
3. CAROLYN Amy	<i>Carolyn Amy</i>	17063 W Shady Pool Ct	000-2960
4. Gayle Kirker	<i>Gayle Kirker</i>	16356 W. Badger Pass Ln	0078260
5. DAN GARYSEY	<i>Dan Garysey</i>	20072 N. Shadow Mountain Dr	0020630
6. ANGELA ROBINSON	<i>Angela Robinson</i>	15959 N Kino Dr, Surprise, AZ	0016261
7. MARY BETH PIEKARSKI	<i>Mary Beth Piekarski</i>	26174 N. HORSE TRAIL DR, SURPRISE	0069860
8. KATHLEEN MAEZ	<i>Kathleen Maez</i>	15322 W. PANTANO Dr. Surprise	0064501
9. Marcia Grina	<i>Marcia Grina</i>	14946 W. Medinah Way Surprise	0023731
10. Deborah Althouse	<i>Deborah Althouse</i>	1754 18478 N. Borgata Dr	0011071

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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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Print Name	Signature	Address	CAM #
1. Annette Bera-Jozwosky	<i>Annette Bera-Jozwosky</i>	20204 N. Esperero Ln Surprise, AZ	0090651
2. Suzi Walling	<i>Suzi Walling</i>	4947 W. Medina Way Surprise, AZ 85374	0024821 0024821
3. Rich Manalis	<i>Rich Manalis</i>	15374 W. ...	0069130
4. Martha Y. Scott	<i>Martha Y. Scott</i>	14950 W Mountain View Apt 6110	6061100
5. Elaine Weber	<i>ELAINE WEB</i>	14950 W Mountain View Blvd Surprise AZ 85374	6062603
6. Lois Hancock	<i>Lois Hancock</i>	14950 Mountain View Blvd 6205 Surprise 85374	6062051
7. Barbara Nelson	<i>Barbara Nelson</i>	15655 W. ... Surprise	
8. Joyce Miller	<i>Joyce Miller</i>	19344 N GUARDIAN LN	0592000
9. Art Silkriter	Arthur Silkriter	" "	
10. Fred ...	James ...	" "	

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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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Print Name	Signature	Address	CAM #
1. Bobbie McConnell	<i>Bobbie McConnell</i>	17409 N. Howland	0036621 0066201
2. Patricia Silverstein	<i>Patricia Silverstein</i>	17644 N Lost Mine Ln	3948-001
3. Elinor Workman	<i>Elinor Workman</i>	17533 N. Howland Dr.	4459-01
4. Patrick J. Kissmore	<i>Patrick Kissmore</i>	16427 W CHAPARRAL LN	0036460
5. Henry Dedinsky	<i>Henry Dedinsky</i>	16317 W. Limatone	2954-000
6. John H. Small	<i>John H. Small</i>	17473 N. Howland	1003550
7. Myrlene Billings	<i>Myrlene Billings</i>	20306 N Esperero Ln	0091561
8. Sheric Hodges	<i>Sheric Hodges</i>	16606 W Cibola Ln	1002231
9. Irma Milson	<i>Irma Milson</i>	19208 N Maondance Ln	1006778
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15/12

PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

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<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Julie Nordan	<i>Julie Nordan</i>	20026 N. Clear Canyon	0011501
2. DENISE POWER	<i>Denise P. Power</i>	15513 W. MOONLIGHTWAY	0016741
3. Vicki J. Gibbs	<i>Vicki T. Gibbs</i>	20007 N. Clear Canyon Dr	0013211
4. Kathy Soderholm	<i>Kathy Soderholm</i>	17421 N Horseshoe Dr	0036181
5. Amy Hael	<i>Amy Hael</i>	16333 W Badger Pass Lane	0097691
6. Barbara Crossant		19607 IV Crescent Ridge Drive	0053271
7. Joan Schweizer	<i>Joan Schweizer</i>	17931 N Madalena	0030921
8. Sharon Berg ↔ SHARON		18272 N. Petrified Forest Dr	0038021
9. Sandy Diller	<i>Sandy Diller</i>	15013 W North Breeze Dr	0018341
10. Karen Kofarsky	<i>Karen Kofarsky</i>	15268 W Springleaf Way	1010811

PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. Elaine Wood	<i>Elaine Wood</i>	16049 W Kino Dr	4053001
2. Judith Way	<i>Judith Way</i>	15563 Rockwood Way	5196001
3. Charlotte McFarland	<i>Charlotte McFarland</i>	16128 W Desert Cove Way	0509-001
4. Steven Borward	<i>St Borward</i>	15749 W. Cinnabar Dr	0069710
5. Beth Guster	<i>Beth Guster</i>	15526 W. Cypress Point Dr.	0014821
6. Lisa Chmelka	<i>Lisa Chmelka</i>	15730 W. Mill Valley Dr.	1003501
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

Print Name	Signature	Address	CAM #
1. Janet Pieschel	<i>[Signature]</i>	16000 W Indigo Lane	0022871
2. LINDA COSS	<i>[Signature]</i>	18662 N Summerbreeze	1002671
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*I double checked
Linda's name
and CAM #*

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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

<u>Print Name</u>	<u>Signature</u>	<u>Address</u>	<u>CAM #</u>
1. TERRY MURPHY	<i>[Signature]</i>	20331 N WILDFLOWER DR	2060180
2. Suzanne McFadden	<i>[Signature]</i>	21328 N Redington Pt. Dr.	0002260
3. LARRY W SMITH	<i>[Signature]</i>	16678 W GARROD	0097210
4. DON W. SWAILES	<i>[Signature]</i>	18306 N. Aspen Ct.	0024270
5. KERRI ELLSWORTH	<i>[Signature]</i>	15817 W Goldenrod Dr.	0050281
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PETITION TO RECALL BOARD MEMBER, THOMAS GUSICH

As members in good standing of The Grand, by signing this petition, we are requesting that, pursuant to Arizona Statute 33-181.3 Removal of Board Member: Special Meeting, the Board of Directors of The Grand call a special meeting for the purpose of recalling/removing current board of director member, Thomas Gusich.

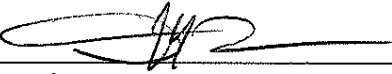
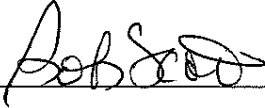
Print Name	Signature	Address	CAM #
1. DAN Mcenan		19337 N. PANDEROSA CT.	0081530
2. Bob Scott		19325 N. PANDEROSA CT.	0082350
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EXHIBIT B



Audra Sinclair <audrasplanet@gmail.com>

Important Update: Recall Vote for Board Member

1 message

The Grand Board of Directors <noreply@scgcam.com>
Reply-To: noreply@livegrandaz.com
To: audrasplanet@gmail.com

Mon, Feb 10, 2025 at 3:31 PM

Can't read or see images? [View this email in a browser.](#)







February 10, 2025

Dear Residents,

On Friday, February 7th, a petition from a group of residents was received by CAM with 1,190 signatures to recall Director Tom Gusich. Legal counsel has confirmed that more than the minimum of 982 signatures were verified.

State law now requires that we conduct a membership meeting within 30 days of receipt of the petition.

As many of you know, Tom Gusich is the director who has sued the Association. His suit seeks to invalidate the Board Standards of Behavior that he voted in favor of. The suit also demands that the Association pay all of his attorney's fees. If this recall is successful, most of the lawsuit should become moot because Tom will no longer be on the Board.

At an Executive Session on Saturday, February 8th, the Board of Directors voted to take the following actions in accordance with ARS 33-1813 and our governing documents:

- **A meeting of the membership will be held on February 24, 2025 at 1:00pm in Sagebrush Ballroom to confirm the results of the recall vote.**
- On Wednesday, February 12th, Grand's vendor, Vote Now, will mail, and email, notices to all homeowners of record as of February 7th at 4pm, with the details of how to vote electronically, via phone, or in person at the CAM office during regular business hours.

- One vote per residence owned is allowed.
- *Absentee, phone, and electronic voting will commence on Wednesday, February 12th when you receive your unique ID, and close on Friday, February 21st at noon.*
- Vote Now will tally the votes in anticipation of the February 24th Membership Meeting.
- If you were unable to vote during the window above, paper ballots will be available at the Membership meeting on February 24th at 1:00pm, upon presentation of your CAM card, and verification that a vote has not been received for that residence.
- A minimum of 1,000 votes must be cast for the recall to be valid.
- The results of the vote will be announced at the Membership Meeting.

NEXT STEPS

- Watch for the email from Vote Now in your email on file with CAM on February 12th, and also a mailed letter at your address of record after February 12th; delivery time will vary.
- Vote using your personal code from Vote Now before noon on February 21st either electronically, via phone, or via absentee ballot.
- Attend the Membership meeting in person on February 24th at 1:00pm in the Sagebrush Ballroom to hear the results of the recall vote.
- An announcement will be sent electronically via a Community Update to all residents directly after the meeting on February 24th.
- Additional information related to this recall can be found on the community website under Community Updates on the home page once you login: www.livegrandaz.com

Please address any questions to the General Manager's office at: administration@livegrandaz.com

Thank you for your attention to this important matter.

Sincerely,

The Board of Directors

[Unsubscribe from all The Grand Community Association eNotifications.](#)

EXHIBIT C-1



David E. Wood
dwood@dessauleslaw.com

7243 North 16th Street
Phoenix, Arizona 85020
☎ 602.753.3841
dessaules.com

March 6, 2025

VIA EMAIL

Lauren Elliot Stine
Quarles & Brady, LLP
(602) 229-5474
Lauren.Stine@quarles.com

Re: *Gusich/Sun City Grand Community Association, Inc.*

Dear Ms. Stine:

As you know, we represent Tom Gusich in the legal dispute between himself and the Board Majority of the Association. This correspondence serves as a demand for records pursuant to A.R.S. § 33-1805.

Please provide us with the following:

1. All petitions for the recall;
2. All alleged signatures to petitions for the recall;
3. All emails to and from recalltomgusich@gmail.com;
4. All communications submitted to <https://recalltomgusichnow.com/> and any responses thereby generated;
5. All communications submitted to <https://tomgusichrecall.com/> and any responses thereby generated; and
6. All ballots and instructions for the recall election.

Section 33-1805 mandates the production of these records within ten business days. Please provide the electronic records in their native, electronic format. If the Association determines that there are costs for that production, please let us know immediately so we can discuss the costs and payment. We look forward to your prompt response.

Sincerely,

David E. Wood

EXHIBIT C-2



Quarles & Brady LLP
Attorneys at Law
One Renaissance Square
Two North Central Avenue
Suite 600
Phoenix, Arizona 85004-2322
602-229-5200
Fax 602-229-5690

Writer's Direct Dial: 602.229.5200
E-Mail: lauren.stine@quarles.com

20 March 2025

VIA EMAIL – DWOOD@DESSAULESLAW.COM

David E. Wood
Dessaules Law Group
7243 North 16th Street
Phoenix, AZ 85020

Re: *Gusich/Sun City Grand Community Association, Inc.*

Dear Mr. Wood:

Pursuant to A.R.S. § 33-1805, and in response to your letter dated March 6, 2025, Sun City Grand Community Association, Inc. produces herewith the documents bates labeled SUNCITYGRAND000001 through SUNCITYGRAND001225. The documents are accessible for download here: <https://quarles.sharefile.com/d-s490148c2e51e4160ac1abd503fe74dbd>

Regards,

A handwritten signature in blue ink, appearing to read "Lauren Elliott Stine". The signature is fluid and cursive, with a large initial "L" and "S".

Lauren Elliott Stine

csW
Enclosures
QB\185596.00001\95341645.1

EXHIBIT C-3



David E. Wood
dwood@dessauleslaw.com

7243 North 16th Street
Phoenix, Arizona 85020
☎ 602.753.3841
dessaules.com

May 1, 2025

VIA EMAIL

Lauren Elliot Stine
QUARLES & BRADY, LLP
One Renaissance Square
Two North Central Avenue, Suite 600
Phoenix, Arizona 85004
Lauren.Stine@quarles.com

Re: *Gusich/Sun City Grand Community Association, Inc.*

Dear Ms. Stine:

We write in response to your March 20, 2025, correspondence and production of documents. While you provided us with some of the documents we requested, there are others we still require.

We again request that you provide us with the following that were requested on March 6, 2025:

1. All petitions for the recall; and
2. All ballots and instructions for the recall election.

Please let us know if the Association's position is that it produced all petitions for the recall. Given the parties' disagreement, it is critical that the Association produce everything it claims was the "petition" that authorized a recall election.

The Association did not produce the ballots and instructions for the actual election.

Given that these items were requested with a statutory response deadline, we are asking that they be produced by the end of the day next Wednesday, May 7, 2025.

We also have an additional demand for records pursuant to A.R.S. § 33-1805.

1. A roster of all members of the Sun City Grand Community Association;
2. A copy of the tally or notes comprising the tally of alleged signatures supporting the petition; and
3. Any community postings, websites or other publications that included the link recalltomgusich@gmail.com.

Section 33-1805 mandates the production of these records within ten business days. Please provide the electronic records in their native, electronic format. If the Association determines that there are costs for that production, please let us know immediately so we can discuss the costs and payment. We look forward to your prompt response.

Sincerely,

David E. Wood

David E. Wood

EXHIBIT D

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DECLARATION OF THOMAS J. GUSICH

I, Thomas J. Gusich, hereby make the following declarations:

1. I am over the age of 18 years old, competent to testify to the truth of the matters contained herein, and attest that the foregoing statements made by me are based upon my personal knowledge unless otherwise stated.

2. I am the named Plaintiff in the action *Gusich v. Sun City Grand Community Association, Inc.*, Case No. CV2025-002634.

3. The case was dismissed due to lack of standing. The Association now seeks to have me pay \$353,743.85.

4. The attorneys' fee and costs award of \$353,743.85 requested by the Association will seriously and adversely impact me financially.

5. I currently have an income of \$5,027 per month with expenses averaging roughly \$3,600 per month, leaving me with around \$1,427 in discretionary spending per month. This income derives from \$2,193 withdrawals from retirement accounts and \$2,834 in social security payments.

6. I have a half-stake ownership in a residential property valued at roughly \$650,000 (\$325,000). This property has an outstanding mortgage balance of roughly \$291,000, of which I am liable for half (\$145,500). I also have roughly \$25,000 in credit card debt.

7. I have slightly over \$300,000 combined in my IRA accounts and roughly \$20,000 in liquid savings for emergencies and discretionary spending.

8. I first took my seat as a Board Member for the Association on April 1, 2024. During my stint as a participating Board Member, I learned detailed information about the Association's finances.

9. I learned that the Association has between \$26,000,000 and \$35,000,000 in reserve funds. It has an additional, \$383,000 per year it is willing to spend on

1 expenses for professional contracts.

2 10. The Association has projected as of June 30, 2025, a surplus of \$600,000
3 vs. budget.

4 11. The Association also retains Curtis Ekmark for roughly \$24,000 per
5 month. This retainer fee costs all hours billed in any month on the Association's
6 behalf. Only when Ekmark's legal fees exceed the retainer is the Association liable
7 for the additional hourly fees that he bills.

8 12. I regularly communicate with Ben Serns who is a friend and was a fellow
9 Board member.

10 13. Ben Serns attended a February 2025 Board meeting during which the
11 board members, excluding myself, discussed hiring outside litigation counsel.

12 14. Mr. Serns and the other Board members were informed that the
13 insurance provider would cover legal expenses of up to \$400 per hour.

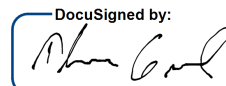
14 15. Mr. Serns conveyed to me that the Board declined to fund the lawsuit
15 through its insurance provider based on the figure above.

16 16. Instead, the Board hired Quarles & Brady.

17 17. The Association had to pay the difference between the rate billed per
18 hour between the rate actually billed and the \$400 cap imposed by the insurance
19 provider.

20 I hereby declare under the penalty of perjury that the foregoing is true and
21 correct.

22 EXECUTED on 8/20/2025.

DocuSigned by:


THOMAS J. GUSICH

EXHIBIT E

1 **DECLARATION OF KEVIN HARPER**

2 I, Kevin Harper, hereby make the following declarations:

3 1. I am over the age of 18 years old, competent to testify to the truth of the
4 matters contained herein, and attest that the foregoing statements made by me are
5 based upon my personal knowledge unless otherwise stated.

6 2. I am an attorney licensed to practice law in Arizona (State Bar No.
7 019118) and a partner at Harper Hall PLC.

8 3. I graduated from the University of Arizona School of Law in 1998 and
9 have maintained an active license to practice law in Arizona since 1998. I also hold
10 an active license in Idaho since 1999. My practice focuses primarily on civil litigation,
11 with substantial experience in homeowners association disputes and other real
12 estate disputes and litigation.

13 4. I am familiar with the hourly rates charged by civil litigations attorneys
14 in the State of Arizona and, in particular, with the rates charged by litigators
15 involved in HOA disputes.

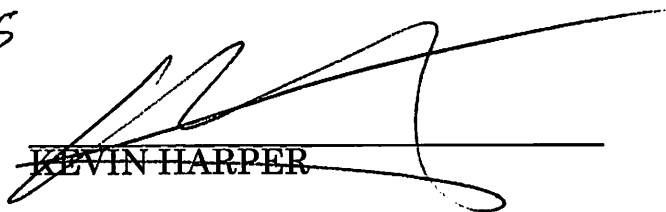
16 5. My current hourly rate is \$400.00 per hour, and another attorney in my
17 firm with the same years of practice experience bills at the same hourly rate.

18 6. I primarily represent property owners and in my experience my rates
19 are commensurate with the rates charged by other partner-level attorneys on both
20 sides of such disputes.

21 7. In my professional opinion based on my knowledge of the legal market
22 in Arizona, hourly rates in excess of \$550.00 for partners are excessive in connection
23 with HOA and/or other real estate related litigation, and hourly rates in excess of
24 \$300.00 are excessive for a junior level attorney without several years of practice
25 experience.

1 I hereby declare under the penalty of perjury that the foregoing is true and
2 correct.

3 EXECUTED on August 19, 2025

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5 ~~KEVIN HARPER~~

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EXHIBIT F-1

EKMARK PECOR LAW

DATE	ATTY/PARA.	HOURS	AMOUNT	DESCRIPTION	COMMUNITY MATTER/LEGAL MATTER	LITIGATION ITEM? RECORDS REQUEST? PETITION?
3/7/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed email from litigation counsel and records request by	C	R
3/13/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding records request.	C	R
3/18/2025	Pecor, Courtney	0.2	\$ 94.00	Worked on Gusich v. Sun City Grand records request issues.	C	R
3/20/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with litigation counsel regarding document disclosure.	C	R
3/21/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding records disclosure.	C	R
5/3/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed letter from Tom attorney and records request.	C	R
5/5/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding Tom records request and drafted response.	C	R
5/5/2025	Pecor, Courtney	0.7	\$ 329.00	Zoom with Quarles litigation counsel regarding records request and recall signatures.	C	R
5/6/2025	Pecor, Courtney	0.4	\$ 188.00	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	C	R
5/7/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed emails regarding Tom's records request.	C	R
5/7/2025	Ekmark, Curtis	0.3	\$ 148.50	Reviewed text from litigation counsel and reviewed email and attachments regarding records request by Tom and drafted response.	C	R
5/8/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding recall votes.	C	R
5/8/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed response from community manager regarding recall votes.	C	R
5/8/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from community manager regarding recall vote issue.	C	R
5/14/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed email from litigation counsel and worked on document request.	C	R
5/15/2025	Pecor, Courtney	0.3	\$ 141.00	Phone call with Quarles attorney regarding Gusich recall.	C	R
5/15/2025	Pecor, Courtney	1.7	\$ 799.00	Reviewed email from litigation counsel and worked on document request.	C	R
5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel to Tom attorney regarding document production.	C	R
5/20/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel regarding documents.	C	R

ITEMIZED CHRONOLOGY OF FEES

	Date	ATTY/PARA.	Title	Hour	Amo	Description
73	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.
74	03/13/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Review client documents for potential production.
75	03/13/25	Stine, Lauren E.	Partner	0.40	\$248.00	Follow up and work regarding document production set.
77	03/15/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer internally with L. Stine regarding response to request for production from Plaintiff.
78	03/15/25	Stine, Lauren E.	Partner	0.20	\$124.00	Communications with D. Roberts re: production.
79	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.
80	03/17/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via email with client regarding matter document production.
82	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.
83	03/17/25	Stine, Lauren E.	Partner	0.90	\$558.00	Work and communications regarding production set.
85	03/18/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Coordinate document production with C. Walters.
87	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.
90	03/18/25	Stine, Lauren E.	Partner	0.40	\$248.00	Attend to and work on client document production.
91	03/19/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Review and revise draft document production cover letter.
93	03/19/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review updated document production set.
94	03/19/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with client regarding proposed document production.
95	03/19/25	Stine, Lauren E.	Partner	0.40	\$248.00	Revise production letter and attention to production set.
97	03/20/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Coordinate production of documents to Plaintiff's counsel.
98	03/20/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer via telephone and email with client regarding production of documents.
100	03/20/25	Stine, Lauren E.	Partner	0.80	\$496.00	Work related to document production.
192	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.
193	05/01/25	Stine, Lauren E.	Partner	0.30	\$186.00	Review letter from counsel regarding client document production.
195	05/02/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with counsel Ekmark regarding supplemental document request sent by Plaintiff.
197	05/02/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Work regarding Plaintiff's documents request and potential response.
203	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.
208	05/06/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Strategize regarding response to supplemental statutory document request issued by Plaintiff.
212	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.
227	05/07/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Draft and revise letter responding to supplemental statutory document request issued by Plaintiff.
229	05/07/25	Stine, Lauren E.	Partner	0.50	\$310.00	Review and revise letter regarding records request and related communications.
255	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.
256	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.
258	05/14/25	Stine, Lauren E.	Partner	0.40	\$248.00	Review and revise draft letter response to records request and related communications.
262	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).
265	05/15/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Revise and finalize letter to opposing counsel regarding documents available for review.
271	05/15/25	Stine, Lauren E.	Partner	0.60	\$372.00	Finalize letter regarding response to records request and related communications with counsel.
284	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.
287	05/16/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communicate with counsel and team regarding request for document inspection.
404	Total					▼}

EXHIBIT F-2

CHDB LAW

2	Date	Attorney/Paralegal	Orig Hrs	Orig Am	Narrative
5	0/29/2024	Ekmark, Curtis	0.10	\$ 49.50	regarding letter from Tom's attorney. Worked on board code of conduct issue.
8	0/29/2024	Ekmark, Curtis	0.10	\$ 49.50	response regarding Tom.
10	0/29/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding issues.
11	0/29/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president to Tom.
12	0/29/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from Tom and drafted response to board president.
14	0/30/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president to Tom counsel and drafted response and drafted email to Tom.
15	0/31/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager and drafted email to Tom's attorney regarding meeting.
16	0/31/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from owner regarding Tom.
17	0/31/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom suit and drafted response.
18	0/31/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member and drafted response regarding Tom meeting at his home.
22	1/3/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president reviewed Tom response.
24	1/3/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding post Tom meeting.
27	11/4/2024	Ekmark, Curtis	0.10	\$ 49.50	Research defamation cases.
31	11/4/2024	Ekmark, Curtis	0.10	\$ 49.50	Worked on defamation issue.
35	11/5/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding mediation.
36	11/5/2024	Ekmark, Curtis	0.10	\$ 49.50	Drafted email to community manager regarding litigation.
37	11/5/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom.
39	11/5/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom's allegation of lies by employee.
41	11/7/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member and points regarding Tom.
42	11/7/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president to board member regarding mediation.
43	11/7/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president to Tom regarding mediation.
44	11/7/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding mediation with Tom.
46	11/8/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding mediation.
48	11/8/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager and email from Tom regarding mediation.
49	11/9/2024	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding response to Tom.
50	11/9/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding rebuttal to Tom's claims.
51	11/9/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding conversation with Tom.
52	11/11/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding town hall and statements by Tom.
53	11/12/2024	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager and board members regarding mediation.
54	11/12/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding statements from Tom.
55	11/12/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation.
56	11/12/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom's allegations.
57	11/12/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding project management.
58	11/12/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding mediation.
59	11/12/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation deadline.
60	11/12/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding [REDACTED] and drafted response.
61	11/12/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president to Tom regarding mediation.
64	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom lawsuit and drafted response.
65	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed text from board president and drafted response regarding mediation.
66	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding mediation.
67	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding mediation.
68	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email and attachment regarding mediation.
69	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom.
70	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom's demands.
71	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding mediation response.
72	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom's refusal to mediate.
73	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation response.
74	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding lack of mediation response.
75	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding mediation message.
76	11/13/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding meeting with Tom.
78	11/14/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed text from board president regarding mediation and drafted response regarding Tom.
80	11/14/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from Tom and drafted response.
81	11/14/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom lawsuit and drafted response.
82	11/14/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom.
83	11/14/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding [REDACTED] Tom.
85	11/15/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation.
88	11/15/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding lawsuit.
89	11/15/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding mediation.
90	11/15/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding Tom issues from board president.
91	11/15/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding letter from Tom's attorney.
93	11/16/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom letter.
94	11/17/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation.
95	11/18/2024	Ekmark, Curtis	0.10	\$ 49.50	Drafted email to community manager regarding interaction with Tom.
96	11/18/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding Tom and [REDACTED] and drafted response.
97	11/18/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation.
100	11/18/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding mediation.
101	11/18/2024	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with board member regarding Tom issues.
103	11/19/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding lawsuit and drafted response.
105	11/19/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding suit.
106	11/20/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation.
108	11/20/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding letter from Tom's attorney.
109	11/20/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation and drafted response and made notes for mediation.
110	11/20/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding mediation.
111	11/20/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding mediation issues.
112	11/20/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding mediation process.
113	11/20/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding mediation outcomes.
114	11/25/2024	Ekmark, Curtis	0.10	\$ 49.50	Drafted email to Tom's attorney regarding mediation.
116	11/25/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from Tom's counsel and drafted email to community manager and board president.
118	11/28/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from Tom's counsel regarding mediation.
119	12/2/2024	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding mediation and town hall.
120	12/3/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president to board member regarding [REDACTED].
121	12/5/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed code of conduct issue.
122	12/8/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding mediation.
123	12/8/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation.
124	12/9/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member and drafted response regarding mediation.
125	12/10/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding mediation and drafted response.
126	12/10/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from opposing counsel regarding mediation and drafted response.
128	12/20/2024	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with board president regarding mediation and communication.
129	12/24/2024	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation.
130	01/6/2025	Ekmark, Curtis	0.10	\$ 49.50	Drafted email to Tom's attorney regarding executive sessions.
131	01/6/2025	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding executive sessions.
132	01/6/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from Tom's attorney regarding executive sessions and mediation.
133	01/6/2025	Ekmark, Curtis	0.10	\$ 49.50	Drafted response to Tom's counsel regarding mediation.
134	01/7/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from counsel for Tom regarding mediation.
135	01/7/2025	Ekmark, Curtis	0.10	\$ 49.50	Drafted email to board president and community manager regarding mediation.
137	01/10/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed emails from board president regarding mediation.
138	01/11/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding mediation and drafted response.
139	01/12/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding meeting with Tom.
141	01/23/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed report of suit filed by Tom.
142	01/23/2025	Ekmark, Curtis	0.10	\$ 49.50	Drafted email to board president and community manager regarding suit filed by Tom.
143	01/23/2025	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding suit by Tom.
145	01/24/2025	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding suit.
146	01/24/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding Tom's suit.
147	01/25/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president and drafted response regarding summons and service.
148	01/26/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member and drafted response regarding Tom suit.
149	01/26/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding lawsuit.
150	01/26/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed text from board president and drafted response.
153	01/27/2025	Ekmark, Curtis	0.10	\$ 49.50	Drafted email to litigation counsel regarding complaint.
157	01/27/2025	Ekmark, Curtis	0.10	\$ 49.50	Drafted email to community manager and board president regarding [REDACTED].
159	01/27/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding lawsuit filed by Tom.
160	01/27/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding service.
161	01/28/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding [REDACTED].
162	01/28/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding [REDACTED] and made notes regarding same.
163	01/29/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding suit.
164	01/29/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding service.
165	01/29/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding message pertaining to lawsuit.
166	01/29/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email and updated language regarding lawsuit.
167	01/29/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager with multiple questions.
168	01/29/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president to board member regarding lawsuit.
169	01/29/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding lawsuit.
170	01/30/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding lawsuit.
171	01/30/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding suit.
172	01/30/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding suit communication.
173	01/30/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding lawsuit and made notes regarding same.
176	02/2/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board president regarding complaint.
177	02/4/2025	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding lawsuit.
178	02/5/2025	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding lawsuit.
182	02/11/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from counsel for owner regarding mediation and drafted response and drafted email to Tom.
184	02/12/2025	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding representation and answer.
185	02/12/2025	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding answer and mediation.
186	02/13/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager and drafted response to litigation counsel.
187	02/13/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding [REDACTED].
189	02/13/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager and drafted response regarding extension and denial.
190	02/13/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding extension request and drafted response.
194	02/16/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding answer.
195	02/17/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding answer.
196	02/18/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding answer.
197	02/19/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from Tom's attorney and drafted email to community manager regarding lawsuit.
198	02/20/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding amended complaint.
199	02/20/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding mediation.
205	02/21/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding lawsuit defense and drafted response.
206	02/21/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding recall.
208	02/21/2025	Ekmark, Curtis	0.10	\$ 49.50	Telephone conference with community manager regarding recall.
210	02/22/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel and drafted response regarding posting.
212	02/22/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding docket.
213	02/22/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding petition.
214	02/22/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email and post regarding [REDACTED].
215	02/22/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding [REDACTED].
216	02/22/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from board member regarding [REDACTED].
217	02/25/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding [REDACTED] and drafted response.
218	02/26/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding [REDACTED] and drafted email to litigation counsel.
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	A	B	C	D	E
1					EKMARK PECOR LAW
2	DATE	ATTY/PARA.	HOURS	AMOUNT	DESCRIPTION
3	3/5/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and drafted response regarding position statement.
4	3/7/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email regarding hearing.
5	3/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with community manager regarding message to community.
6	3/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from board president regarding Tom update to board.
7	3/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed update from litigation counsel.
8	3/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with board president regarding message to
9	3/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from board president regarding update to community.
10	3/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from board president regarding message to community.
11	3/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from board member regarding message to community.
12	3/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from board president regarding message to community.
13	3/10/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with board member regarding communication to membership.
14	3/12/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel.
15	3/13/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding records request.
16	3/21/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding records disclosure.
17	3/21/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email regarding legislation and drafted response.
18	3/26/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager and drafted response regarding Tom settlement.
19	3/27/2025	Ekmark,Curtis	0.1	\$ 49.50	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
20	3/27/2025	Ekmark,Curtis	0.1	\$ 49.50	Drafted email to litigation counsel regarding Tom issues.
21	3/31/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from board president and drafted response regarding [REDACTED].
22	4/1/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding motion to dismiss.
23	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and attachments and drafted response.
24	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from board president to litigation counsel regarding filing.
25	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding filing.
26	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding filing.
27	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager regarding filing.
28	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding minutes.
29	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding motion.
30	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from former board president regarding filing.
31	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email and attachment regarding filing.
32	4/9/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from board member regarding declaration.
33	4/15/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed recall analysis.
34	4/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from opposing counsel regarding response to motion.
35	4/23/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed pleading filed by Tom's attorney
36	4/23/2025	Ekmark,Curtis	0.1	\$ 49.50	Drafted email to litigation counsel regarding pleading filed by Tom.
37	4/23/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding Tom's pleading and drafted response.
38	4/28/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager regarding Tom vote.
39	4/29/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email to litigation counsel.
40	5/5/2025	Pecor,Courtney	0.1	\$ 47.00	Drafted email to litigation counsel regarding Gusich signature analysis.
41	5/5/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding Tom records request and drafted response.
42	5/6/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager regarding Tealstone and drafted email to litigation
43	5/7/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed pleading filed by litigation counsel.
44	5/7/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed emails regarding Tom's records request.
45	5/8/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding recall votes.
46	5/8/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed response from community manager regarding recall votes.
47	5/8/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager regarding recall vote issue.
48	5/8/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding voting allegations made by Tom.
49	5/8/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding voting and drafted response.
50	5/8/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel regarding voting issue raised by Tom.
51	5/8/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel and attached vote results for hearing.
52	5/14/2025	Pecor,Courtney	0.1	\$ 47.00	Phone call with Quarles regarding recall issues.
53	5/15/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with community manager regarding recall issues and Tom challenge.
54	5/15/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding discovery dispute with Tom's attorney.
55	5/15/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding hearing exhibits.
56	5/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding exhibits.
57	5/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding minutes and exhibits for hearing.
58	5/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from Tom's attorney regarding hearing.
59	5/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding witness preparation.
60	5/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed minutes and documents to be used at trial.
61	5/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email regarding witness prep for hearing.
62	5/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email and attachments for hearing exhibits.
63	5/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel to Tom attorney regarding document production.
64	5/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding petition.
65	5/17/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding witness prep and drafted response.
66	5/17/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding sealing record.
67	5/17/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding witnesses.
68	5/17/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager regarding witnesses.
69	5/17/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and witness list.
70	5/18/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding Tom's complaint under standards and drafted response.
71	5/18/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email regarding witness preparation and drafted
72	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and minute entry from court.
73	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Worked on recall analysis for hearing.
74	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding witness declaration.
75	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding expense
76	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel regarding special meeting.
77	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email regarding mootness issue.
78	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed updated witness declaration.
79	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding exhibit.
80	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding exhibits for
81	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel to witness.
82	5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed filing by litigation counsel.
83	5/20/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel regarding documents.
84	5/20/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email regarding meeting at Tom's home.
85	5/20/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed motion to quash.
86	5/20/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email and board talking points to prepare for hearing.
87	5/20/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email and executive session minutes to prepare for hearing.
88	5/20/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed censorship memo pertaining to Tom.
89	5/21/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed exhibit to be used at hearing.
90	5/21/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email to community manager regarding exhibit.
91	5/21/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from former board president to litigation counsel.
92	5/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Drafted text to litigation counsel regarding hearing and reviewed response.
93	5/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding executive session issues.
94	5/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed text from litigation counsel and drafted response regarding executive sessions.
95	5/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Drafted email to community manager and response to members.
96	5/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email regarding trial date.
97	5/23/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding hearing.
98	5/23/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email regarding Tom notice.
99	5/23/2025	Ekmark,Curtis	0.1	\$ 49.50	Drafted email to litigation counsel regarding hearing.
100	5/25/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding hearing transcript.
101	5/28/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed order in Tom case.
102	6/7/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from board president and text from Tom and drafted response.
103	6/8/2025	Ekmark,Curtis	0.1	\$ 49.50	Worked on rebutting arguments made by Tom's attorney in reply brief.
104	6/10/2025	Ekmark,Curtis	0.1	\$ 49.50	Worked response to allegations in Tom's reply brief.
105	6/16/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and drafted response.
106	6/21/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and drafted response regarding oral argument.
107	6/24/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel.
108	7/14/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with board member regarding ruling.
109	7/21/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding fee application.
110	7/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding fee application.
111	7/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Worked on fee application.
112	7/24/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with community manager regarding fee application.
113	7/28/2025	Ekmark,Curtis	0.1	\$ 49.50	Worked on fee application.
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EXHIBIT F-3

DATE	ATTY/PARA.	HOURS	AMOUNT	DESCRIPTION	COMMUNITY MATTER/LEGAL MATTER	LITIGATION ITEM? RECORDS REQUEST? PETITION?
4/14/2025	Pecor,Courtney	0.3	\$ 141.00	Reviewed and responded to emails from Quarles attorney regarding owner list and signatures.	C	P
4/28/2025	Ekmark,Curtis	0.3	\$ 148.50	Telephone conference with community manager regarding lease	C	P
4/29/2025	Pecor,Courtney	3.4	\$ 1,598.00	Reviewed petition database and final voting report to prepare for litigation.	C	P
4/30/2025	Pecor,Courtney	2.5	\$ 1,175.00	Worked on final Gusich voting results compared to petition	C	P

EXHIBIT F-4

CHDB LAW

	Date	Attorney/ Paralegal	Orig Hrs	Orig Am	Narrative
154	01/27/2025	Ekmark, Curtis	0.20	\$ 99.00	Telephone conference with litigation counsel regarding suit filed by Tom.
159	01/27/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding lawsuit filed by Tom.
160	01/27/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding service.
161	01/28/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email regarding [REDACTED].
165	01/29/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding message pertaining to lawsuit.
175	01/31/2025	Ekmark, Curtis	0.20	\$ 99.00	Reviewed revised statutory memo and drafted email to community manager regarding same.
180	02/6/2025	Ekmark, Curtis	0.20	\$ 99.00	Telephone conference with litigation counsel.
187	02/13/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding [REDACTED].
188	02/13/2025	Ekmark, Curtis	0.20	\$ 99.00	Reviewed email from litigation counsel and drafted response and drafted email to community manager
192	02/13/2025	Ekmark, Curtis	0.60	\$ 297.00	Telephone conference with board president and community manager and Telephone conference with
193	02/15/2025	Ekmark, Curtis	0.20	\$ 99.00	Reviewed proposed response from litigation counsel to opposing counsel and drafted response.
196	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
197	02/19/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding amended complaint.
201	02/20/2025	Ekmark, Curtis	0.20	\$ 99.00	Telephone conference with litigation counsel regarding pleadings filed by opposing counsel.
202	02/20/2025	Ekmark, Curtis	0.70	\$ 346.50	Telephone conference with litigation counsel and board president and community manager regarding
207	02/21/2025	Ekmark, Curtis	0.20	\$ 99.00	Reviewed email from litigation counsel regarding hearing date and Telephone conference with
210	02/22/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel and drafted response regarding posting.
212	02/22/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding docket.
217	02/25/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from litigation counsel regarding [REDACTED] and drafted response.
218	02/26/2025	Ekmark, Curtis	0.10	\$ 49.50	Reviewed email from community manager regarding [REDACTED] and drafted email to litigation counsel
220	02/27/2025	Ekmark, Curtis	0.20	\$99.00	Telephone conference with litigation counsel regarding call with Tom's attorney.
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1	EKMARK PECOR LAW				
2	DATE	ATTY/PARA.	HOURS	AMOUNT	DESCRIPTION
3	3/6/2025	Ekmark, Curtis	0.5	\$ 247.50	Reviewed response drafted by litigation counsel and telephone conference with litigation counsel regarding same.
4	3/7/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email regarding hearing.
5	3/7/2025	Ekmark, Curtis	0.5	\$ 247.50	Telephone conference with litigation counsel regarding hearing and telephone conference with community manager regarding hearing and made notes
6	3/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Telephone conference with community manager regarding message to community.
7	3/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from board president regarding Tom update to board.
8	3/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed update from litigation counsel.
9	3/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Telephone conference with board president regarding message to
10	3/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from board president regarding update to community.
11	3/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from board president regarding message to community.
12	3/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from board member regarding message to community.
13	3/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from board president regarding message to community.
14	3/9/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed and revised message to community and email to board president and community manager regarding same.
15	3/12/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel.
16	3/18/2025	Ekmark, Curtis	0.3	\$ 148.50	Reviewed email from litigation counsel regarding discovery sent
17	3/20/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with litigation counsel regarding new evidence and strategy.
18	3/20/2025	Ekmark, Curtis	0.3	\$ 148.50	Telephone conference with litigation counsel regarding strategy and sent email to board member regarding email sent to owners and evidence.
19	3/21/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding records disclosure.
20	3/21/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email regarding legislation and drafted response.
21	3/26/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from community manager and drafted response regarding Tom settlement.
22	3/27/2025	Ekmark, Curtis	0.1	\$ 49.50	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
23	3/27/2025	Ekmark, Curtis	0.1	\$ 49.50	Drafted email to litigation counsel regarding Tom issues.
24	4/1/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding motion to dismiss.
25	4/2/2025	Ekmark, Curtis	2.2	\$ 1,089.00	Reviewed motion to dismiss and drafted notes and email to litigation counsel.
26	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and attachments and drafted response.
27	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from board president to litigation counsel regarding filing.
28	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding filing.
29	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding filing.
30	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from community manager regarding filing.
31	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding minutes.
32	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding motion.
33	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from former board president regarding filing.
34	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email and attachment regarding filing.
35	4/9/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from board member regarding declaration.
36	4/9/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed email and minutes and drafted email to litigation
37	4/21/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with litigation counsel.
38	4/22/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from opposing counsel regarding response to motion.
39	4/23/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed pleading filed by Tom's attorney
40	4/23/2025	Ekmark, Curtis	0.1	\$ 49.50	Drafted email to litigation counsel regarding pleading filed by Tom.
41	4/23/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding Tom's pleading and drafted response.
42	4/28/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from community manager regarding Tom vote.
43	4/29/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email to litigation counsel.
44	4/30/2025	Ekmark, Curtis	0.5	\$ 247.50	Prepared for and participated in call with litigation counsel.
45	5/3/2025	Ekmark, Curtis	0.3	\$ 148.50	Reviewed analysis of Tom recall vote and drafted email to
46	5/5/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed recall analysis for litigation counsel.
47	5/5/2025	Ekmark, Curtis	0.3	\$ 148.50	Reviewed email from litigation counsel and attachments to prepare for call.
48	5/5/2025	Pecor, Courtney	0.7	\$ 329.00	Zoom with Quarles litigation counsel regarding records request and recall signatures.
49	5/5/2025	Ekmark, Curtis	0.7	\$ 346.50	Zoom with litigation counsel to discuss reply brief and records request from Tom and hearing.
50	5/7/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed pleading filed by litigation counsel.
51	5/7/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed emails regarding Tom's records request.
52	5/7/2025	Ekmark, Curtis	0.2	\$ 99.00	Zoom with litigation counsel to discuss reply brief.
53	5/7/2025	Ekmark, Curtis	0.3	\$ 148.50	Reviewed text from litigation counsel and reviewed email and attachments regarding records request by Tom and drafted response.
54	5/8/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding voting allegations made by Tom.
55	5/8/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding voting and drafted response.
56	5/8/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel regarding voting issue raised by Tom.
57	5/8/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel and attached vote results for hearing.
58	5/8/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed email from litigation counsel regarding vote allegations made by Tom and drafted response and telephone conference with litigation counsel regarding same.
59	5/8/2025	Ekmark, Curtis	0.6	\$ 297.00	Reviewed revised reply brief and telephone conference with litigation counsel regarding same.
60	5/14/2025	Pecor, Courtney	0.1	\$ 47.00	Phone call with Quarles regarding recall issues.
61	5/14/2025	Pecor, Courtney	0.5	\$ 235.00	Reviewed and responded to email from Quarles regarding petition database and email spreadsheet.
62	5/15/2025	Ekmark, Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding discovery dispute with Tom's attorney.
63	5/15/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding hearing exhibits.
64	5/15/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with litigation counsel regarding hearing exhibits and witnesses.
65	5/15/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed email from Tom's attorney and text from litigation counsel and drafted response.
66	5/15/2025	Ekmark, Curtis	0.3	\$ 148.50	Telephone conference with litigation counsel regarding email from opposing counsel regarding hearing.
67	5/15/2025	Ekmark, Curtis	0.4	\$ 198.00	Worked on recall issue for litigation counsel and telephone conference with litigation counsel regarding same.
68	5/15/2025	Ekmark, Curtis	0.8	\$ 396.00	Reviewed email from litigation counsel and text from litigation counsel and telephone conference with litigation counsel regarding recall challenge by Tom.
69	5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding exhibits.
70	5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding minutes and exhibits for hearing.
71	5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from Tom's attorney regarding hearing.
72	5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding witness preparation.
73	5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed minutes and documents to be used at trial.
74	5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email regarding witness prep for hearing.
75	5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email and attachments for hearing exhibits.
76	5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel to Tom attorney regarding document production.
77	5/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding petition.
78	5/16/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed email from litigation counsel regarding disclosure and drafted response.
79	5/16/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed email from litigation counsel and telephone conference with litigation counsel regarding [REDACTED].
80	5/16/2025	Ekmark, Curtis	0.5	\$ 247.50	Reviewed email from litigation counsel and list of witnesses and exhibits and telephone conference with litigation counsel regarding [REDACTED].
81	5/17/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding witness prep and drafted response.
82	5/17/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding sealing record.
83	5/17/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding witnesses.
84	5/17/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and witness list.
85	5/17/2025	Ekmark, Curtis	0.3	\$ 148.50	Reviewed email from litigation counsel and witness and exhibit list submitted by Tom and drafted response and drafted email to community manager regarding [REDACTED].
86	5/18/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding Tom's complaint under standards and drafted response.
87	5/18/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email regarding witness preparation and drafted [REDACTED].
88	5/18/2025	Ekmark, Curtis	0.5	\$ 247.50	Telephone conference with litigation counsel regarding exhibits and witnesses disclosed by opposing counsel.
89	5/18/2025	Ekmark, Curtis	0.9	\$ 445.50	Reviewed documents disclosed by opposing counsel for hearing.
90	5/19/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding witness declaration.
91	5/19/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding expense
92	5/19/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel regarding special meeting.
93	5/19/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email regarding mootness issue.
94	5/19/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed updated witness declaration.
95	5/19/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding exhibit.
96	5/19/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding exhibits for
97	5/19/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel to witness.
98	5/19/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed filing by litigation counsel.
99	5/19/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with litigation counsel regarding hearing
100	5/20/2025	Ekmark, Curtis	0.8	\$ 396.00	Reviewed email from litigation counsel and revised response to
101	5/20/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed motion to quash.
102	5/20/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email and executive session minutes to prepare for hearing.
103	5/20/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email and executive session minutes to prepare for hearing.
104	5/20/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with litigation counsel regarding witness selection.
105	5/20/2025	Ekmark, Curtis	0.2	\$ 99.00	Reviewed emails and executive session minutes pertaining to Tom case.
106	5/20/2025	Ekmark, Curtis	0.5	\$ 247.50	Telephone conference with litigation counsel regarding oral argument and reviewed emails and drafted response.
107	5/20/2025	Ekmark, Curtis	1.6	\$ 792.00	Zoom with litigation counsel and witnesses.
108	5/21/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed exhibit to be used at hearing.
109	5/21/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from former board president to litigation counsel.
110	5/21/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with litigation counsel regarding hearing strategy.
111	5/22/2025	Ekmark, Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding executive session issues.
112	5/22/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email regarding trial date.
113	5/22/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with board president regarding hearing.
114	5/22/2025	Ekmark, Curtis	0.3	\$ 148.50	Telephone conference with litigation counsel regarding hearing.
115	5/22/2025	Ekmark, Curtis	0.5	\$ 247.50	Reviewed email from litigation counsel and drafted response regarding standing and indemnity
116	5/23/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding hearing.
117	5/23/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email regarding Tom notice.
118	5/23/2025	Ekmark, Curtis	0.1	\$ 49.50	Drafted email to litigation counsel regarding hearing.
119	5/25/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding hearing transcript.
120	5/28/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with litigation counsel regarding hearing issues.
121	6/2/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with board president regarding Tom and attorney fee issues.
122	6/7/2025	Ekmark, Curtis	0.2	\$ 99.00	Telephone conference with board president regarding [REDACTED].
123	6/16/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and drafted response.
124	6/21/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel and drafted response regarding oral argument.
125	6/23/2025	Ekmark, Curtis	0.3	\$ 148.50	Made notes and Telephone conference with litigation counsel to prepare for oral argument.
126	6/24/2025	Ekmark, Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel.
127	6/25/2025	Ekmark, Curtis	0.5	\$ 247.50	Telephone conference with litigation counsel and telephone conference with community manager and drafted update to owners.
128	7/11/2025	Ekmark, Curtis	0.9	\$ 445.50	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
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	ITEMIZED CHRONOLOGY OF FEES					
2	Date	ATTY/PARA.	Title	Hour	Amo	Description
18	02/20/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Participate in conference call with L. Stine and client representatives.
19	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).
26	02/21/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer internally with L. Stine regarding strategy for matter.
34	02/24/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer internally regarding status of matter and strategy.
37	02/25/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Strategize with L. Stine regarding matter and next steps.
40	02/26/25	Stine, Lauren E.	Partner	0.10	\$62.00	Call and message to counsel regarding order to show cause hearing.
41	02/26/25	Stine, Lauren E.	Partner	0.10	\$62.00	Communications with C. Ekmark regarding [REDACTED]
42	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.
46	03/05/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Review communications from opposing counsel.
52	03/06/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with counsel regarding document request and order to show cause hearing.
55	03/07/25	Contrera, Jack H.	Associate	0.40	\$182.00	Participate in internal strategy meeting regarding background and drafting motion to dismiss.
57	03/07/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Review client communications.
59	03/07/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer internally regarding drafting of motion to dismiss.
64	03/10/25	Contrera, Jack H.	Associate	0.90	\$409.50	Internal meeting with legal team discussing motion strategy and potential arguments.
68	03/11/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer with internally J. Contrera regarding draft motion to dismiss and [REDACTED].
77	03/15/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer internally with L. Stine regarding response to request for production from Plaintiff.
78	03/15/25	Stine, Lauren E.	Partner	0.20	\$124.00	Communications with D. Roberts re: production.
80	03/17/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via email with client regarding matter document production.
82	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.
85	03/18/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Coordinate document production with C. Walters.
87	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.
94	03/19/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with client regarding proposed document production.
97	03/20/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Coordinate production of documents to Plaintiff's counsel.
98	03/20/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer via telephone and email with client regarding production of documents.
101	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.
112	03/28/25	Contrera, Jack H.	Associate	0.10	\$45.50	Confer internally regarding findings of legal research.
113	03/28/25	Contrera, Jack H.	Associate	0.30	\$136.50	Confer internally regarding edits and research related to drafting motion to dismiss.
116	03/28/25	Roberts, Daniel G.	Partner	3.00	\$1,860.00	Confer internally with J. Contrera regarding revisions to draft motion to dismiss.
120	03/31/25	Contrera, Jack H.	Associate	0.30	\$136.50	Confer internally regarding draft language to include in motion to dismiss.
125	03/31/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with J. Hochman and C. Ekmark regarding hearing.
130	04/03/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with Ekmark firm regarding [REDACTED].
131	04/03/25	Stine, Lauren E.	Partner	1.00	\$620.00	Communications with C. Ekmark re: motion to dismiss and revise same.
134	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.
139	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.
141	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.
143	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.
145	04/08/25	Stine, Lauren E.	Partner	0.50	\$310.00	Participate in strategy meeting regarding preliminary injunction hearing.
147	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].
149	04/09/25	Stine, Lauren E.	Partner	0.20	\$124.00	Communications regarding exhibits to complaint and meeting minutes.
156	04/14/25	Contrera, Jack H.	Associate	0.20	\$91.00	Confer internally regarding strategy and updates to draft discovery.
157	04/14/25	Contrera, Jack H.	Associate	0.20	\$91.00	Confer internally to discuss drafting preliminary injunction application response.
159	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).
160	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.
166	04/15/25	Contrera, Jack H.	Associate	0.20	\$91.00	Confer internally to discuss motion briefing strategy.
168	04/15/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Confer internally regarding strategy on response to application for preliminary injunction.
170	04/15/25	Stine, Lauren E.	Partner	0.30	\$186.00	Strategy call with Ekmark firm recall petition analysis.
178	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.
180	04/25/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with C. Ekmark regarding matter.
182	04/28/25	Contrera, Jack H.	Associate	0.60	\$273.00	Confer internally to discuss case and next steps.
183	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.
184	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).
188	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.
189	04/30/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Participate in conference call with C. Ekmark regarding filings.
191	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.
195	05/02/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with counsel Ekmark regarding supplemental document request sent by Plaintiff.
201	05/05/25	Roberts, Daniel G.	Partner	0.20	\$124.00	Confer via email with client and client counsel to schedule conference call.
204	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.
206	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.
212	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.
216	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.
221	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.
222	05/07/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Coordinate and review expanded research related to defenses.
223	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.
235	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.
266	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.
267	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.
269	05/15/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with counsel regarding list exchange and extension.
275	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.
276	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.
277	05/16/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Coordinate filing of witness and exhibit list.
278	05/16/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Confer internally with J. Contrera regarding preparation of additional petition exhibit.
279	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.
287	05/16/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communicate with counsel and team regarding request for document inspection.
295	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.
302	05/19/25	Contrera, Jack H.	Associate	0.70	\$318.50	Attend strategy meeting for hearing on application for preliminary injunction.
304	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.
316	05/21/25	Contrera, Jack H.	Associate	0.60	\$273.00	Meeting with team to discuss additional hearing preparation steps.
334	05/23/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Review status of matter and consider additional research tasks.
335	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.
336	05/23/25	Stine, Lauren E.	Partner	0.40	\$248.00	Follow up tasks and communications regarding hearing and next steps.
338	05/28/25	Stine, Lauren E.	Partner	0.20	\$124.00	Confer with C. Ekmark re: hearing and follow up.
341	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.
344	06/04/25	Roberts, Daniel G.	Partner	0.10	\$62.00	Confer via email with client (J. Hochman) regarding matter.
351	06/12/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Work on strategy for upcoming hearings.
356	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.
357	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.
369	07/11/25	Stine, Lauren E.	Partner	0.10	\$62.00	Confer with D. Roberts regarding Application for Fees and Costs.
370	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).
373	07/17/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with D. Roberts re: fee application and supporting materials for same (.3).
375	07/21/25	Contrera, Jack H.	Associate	0.30	\$136.50	Confer internally with D. Roberts research into attorneys' fees application.
378	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).
386	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.
392	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.
393	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.
398	07/30/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Confer via email with C. Ekmark regarding draft declaration and exhibit thereto.
402	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).
403	07/30/25	Stine, Lauren E.	Partner	0.50	\$310.00	Communications with D. Roberts re: revisions to fee application and supporting exhibits.
404	Total					

EXHIBIT F-5

A	B	C	D	E	F	G	H
EKMARK PECOR LAW							
					COMMUNITY MATTER/LEGAL MATTER	LITIGATION ITEM? RECORDS REQUEST? PETITION?	GENERIC?
DATE	ATTY/PARA.	HOURS	AMOUNT	DESCRIPTION			
7/21/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding fee application.	L	FA	
7/21/2025	Ekmark,Curtis	0.2	\$ 99.00	Worked on fee application.	L	FA	
7/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with litigation counsel regarding fee application.	L	FA	
7/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Worked on fee application.	L	FA	
7/24/2025	Ekmark,Curtis	0.1	\$ 49.50	Telephone conference with community manager regarding fee application.	L	FA	
7/24/2025	Ekmark,Curtis	0.5	\$ 247.50	Worked on fee application and drafted email to community manager regarding same.	L	FA	
7/27/2025	Ekmark,Curtis	0.9	\$ 445.50	Reviewed file to assist with fee application for Tom case.	L	FA	
7/28/2025	Ekmark,Curtis	0.1	\$ 49.50	Worked on fee application.	L	FA	

ITEMIZED CHRONOLOGY OF FEES

	Date	ATTY/PARA.	Title	Hour	Amo	Description
371	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).
372	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).
373	07/17/25	Stine, Lauren E.	Partner	0.30	\$186.00	Communications with D. Roberts re: fee application and supporting materials for same (.3).
374	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.
376	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).
377	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.
378	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).
380	07/22/25	Roberts, Daniel G.	Partner	2.80	\$1,736.00	Review and revise application for attorneys' fees and costs.
381	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.
382	07/22/25	Roberts, Daniel G.	Partner	1.10	\$682.00	Research legal issues related to fee application
383	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).
384	07/23/25	Roberts, Daniel G.	Partner	3.50	\$2,170.00	Review and revise draft fee application and supporting documents.
385	07/23/25	Roberts, Daniel G.	Partner	1.40	\$868.00	Perform legal research related to legal issues raised by fee application.
386	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.
387	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).
388	07/24/25	Roberts, Daniel G.	Partner	2.80	\$1,736.00	Continue reviewing and revising draft application for attorneys' fees and costs.
389	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
390	07/25/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Draft declarations in support of application for award of attorneys' fees and costs.
391	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
392	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.
393	07/28/25	Stine, Lauren E.	Partner	0.40	\$248.00	Communications with C. Ekmark re: attorneys' fee application contents and related internal follow
394	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.
396	07/29/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Review and revise application for award of attorneys' fees and costs.
397	07/30/25	Roberts, Daniel G.	Partner	0.70	\$434.00	Review and revise draft application for attorneys' fees and costs.
400	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.
401	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.
402	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).
403	07/30/25	Stine, Lauren E.	Partner	0.50	\$310.00	Communications with D. Roberts re: revisions to fee application and supporting exhibits.

EXHIBIT F-6

EKMARK PECOR LAW

DATE <input type="text"/>	ATTY/PARA. <input type="text"/>	HOURS <input type="text"/>	AMOUNT <input type="text"/>	DESCRIPTION <input type="text"/>	COMMUNITY MATTER/LEGAL MATTER <input type="text"/>	LITIGATION ITEM? RECORDS REQUEST? PETITION? <input type="text"/>	GENERIC? <input type="text"/>
3/18/2025	Ekmark,Curtis	0.2	\$ 99.00	Telephone conference with litigation counsel regarding document request and motion to dismiss.	L	MTD	
4/1/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding motion to dismiss.	L	MTD	G
4/2/2025	Ekmark,Curtis	2.2	\$ 1,089.00	Reviewed motion to dismiss and drafted notes and email to litigation counsel.	L	MTD	G

	A	B	C	D	E	F
1	ITEMIZED CHRONOLOGY OF FEES					
2	Date	ATTY/PARA.	Title	Hour	Amo	Description
54	03/07/25	Contrera, Jack H.	Associate	1.80	\$819.00	Begin drafting motion to dismiss.
59	03/07/25	Roberts, Daniel G.	Partner	0.30	\$186.00	Confer internally regarding drafting of motion to dismiss.
65	03/10/25	Contrera, Jack H.	Associate	4.20	\$1,911.00	Draft motion to dismiss.
67	03/11/25	Contrera, Jack H.	Associate	3.30	\$1,501.50	Continue to draft motion to dismiss.
70	03/12/25	Contrera, Jack H.	Associate	1.30	\$591.50	Finalize motion to dismiss, conduct proofread and citation check, circulate with legal team.
81	03/17/25	Roberts, Daniel G.	Partner	0.60	\$372.00	Review and revise draft motion to dismiss.
88	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.
92	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.
99	03/20/25	Roberts, Daniel G.	Partner	1.50	\$930.00	Continue drafting and revising motion to dismiss.
103	03/24/25	Roberts, Daniel G.	Partner	3.80	\$2,356.00	Continue drafting and revising motion to dismiss.
104	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.
107	03/27/25	Contrera, Jack H.	Associate	0.50	\$227.50	Review of revised motion to dismiss and correspondence concerning proposed revisions.
108	03/27/25	Roberts, Daniel G.	Partner	0.60	\$372.00	Perform additional legal research related to defenses raised in motion to dismiss.
109	03/27/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Review and revise draft motion to dismiss.
110	03/27/25	Stine, Lauren E.	Partner	1.00	\$620.00	Work on revisions to motion to dismiss.
114	03/28/25	Contrera, Jack H.	Associate	0.70	\$318.50	Revise and draft motion to dismiss.
117	03/28/25	Stine, Lauren E.	Partner	0.70	\$434.00	Work on motion to dismiss research and related communications.
118	03/29/25	Contrera, Jack H.	Associate	3.40	\$1,547.00	Draft motion to dismiss.
119	03/30/25	Contrera, Jack H.	Associate	0.70	\$318.50	Proofread and review motion to dismiss.
120	03/31/25	Contrera, Jack H.	Associate	0.30	\$136.50	Confer internally regarding draft language to include in motion to dismiss.
121	03/31/25	Contrera, Jack H.	Associate	0.20	\$91.00	Review partner revisions to motion to dismiss.
124	03/31/25	Roberts, Daniel G.	Partner	2.30	\$1,426.00	Revise draft motion to dismiss.
126	04/01/25	Roberts, Daniel G.	Partner	1.50	\$930.00	Review and revise draft motion to dismiss.
127	04/01/25	Stine, Lauren E.	Partner	1.50	\$930.00	Revise motion to dismiss (1.1); communications with client regarding same (.4).
129	04/02/25	Stine, Lauren E.	Partner	0.30	\$186.00	Work regarding motion to dismiss.
131	04/03/25	Stine, Lauren E.	Partner	1.00	\$620.00	Communications with C. Ekmark re: motion to dismiss and revise same.
132	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).
133	04/04/25	Stine, Lauren E.	Partner	1.00	\$620.00	Continue to work on motion to dismiss and supporting declaration.
134	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.
135	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.
136	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.
137	04/07/25	Stine, Lauren E.	Partner	1.10	\$682.00	Work on motion to dismiss declaration and related communications with clients.
138	04/08/25	Contrera, Jack H.	Associate	2.10	\$955.50	Review of motion to dismiss and supporting materials.
140	04/08/25	Contrera, Jack H.	Associate	2.10	\$955.50	Prepare and finalize documents for filing.
142	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.
144	04/08/25	Stine, Lauren E.	Partner	1.40	\$868.00	Work on motion to dismiss and final edits to same.
146	04/09/25	Contrera, Jack H.	Associate	1.80	\$819.00	Proof, finalize, and coordinate filing of motion to dismiss.
148	04/09/25	Roberts, Daniel G.	Partner	0.80	\$496.00	Review and revise draft motion to dismiss and update citations.
150	04/09/25	Stine, Lauren E.	Partner	0.80	\$496.00	Work on finalizing motion to dismiss for filing and related communications.
185	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.
194	05/02/25	Contrera, Jack H.	Associate	3.10	\$1,410.50	Continue drafting reply in support of motion to dismiss.
198	05/04/25	Contrera, Jack H.	Associate	1.60	\$728.00	Draft introduction and fact section of reply in support of motion to dismiss.
199	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.
202	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.
209	05/06/25	Roberts, Daniel G.	Partner	3.30	\$2,046.00	Continue drafting and revising reply in support of motion to dismiss.
210	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.
211	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.
214	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.
215	05/06/25	Stine, Lauren E.	Partner	1.20	\$744.00	Evaluate legal research for reply in support of motion to dismiss.
219	05/07/25	Contrera, Jack H.	Associate	1.60	\$728.00	Proofread and revise draft reply in support of motion to dismiss.
226	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.
228	05/07/25	Roberts, Daniel G.	Partner	2.30	\$1,426.00	Review and revise draft reply in support of motion to dismiss.
232	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.
233	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.
234	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
236	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.
237	05/08/25	Stine, Lauren E.	Partner	2.20	\$1,364.00	Work on final edits to reply in support of motion to dismiss.
404	Total			94.70	\$52,559.50	

EXHIBIT F-7

EKMARK PECOR LAW

DATE	ATTY/PARA.	HOURS	AMOUNT	DESCRIPTION	COMMUNITY MATTER/LEGAL MATTER	LITIGATION ITEM? RECORDS REQUEST? PETITION?	GENERIC?
4/22/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from opposing counsel regarding response to motion.	L	Re	G
4/23/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed pleading filed by Tom's attorney	L	Re	G
4/23/2025	Ekmark,Curtis	0.1	\$ 49.50	Drafted email to litigation counsel regarding pleading filed by Tom.	L	Re	G
4/23/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding Tom's pleading and drafted response.	L	Re	G
4/26/2025	Ekmark,Curtis	0.9	\$ 445.50	Reviewed recall statute to worked on reply brief.	L	Re	
4/26/2025	Ekmark,Curtis	1	\$ 495.00	Reviewed governing documents for arguments in support of reply brief.	L	Re	
4/26/2025	Ekmark,Curtis	2.2	\$ 1,089.00	Reviewed response to motion to dismiss filed by Tom and drafted	L	Re	
5/5/2025	Ekmark,Curtis	0.7	\$ 346.50	Zoom with litigation counsel to discuss reply brief and records request from Tom and hearing.	L	Re	G
5/7/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed pleading filed by litigation counsel.	L	Re	G
5/7/2025	Ekmark,Curtis	0.2	\$ 99.00	Zoom with litigation counsel to discuss reply brief.	L	Re	G
5/7/2025	Ekmark,Curtis	0.8	\$ 396.00	Reviewed NPCA and drafted email to litigation counsel regarding same to use in reply brief.	L	Re	
5/7/2025	Ekmark,Curtis	0.9	\$ 445.50	Reviewed reply brief and drafted email to litigation counsel.	L	Re	
5/8/2025	Ekmark,Curtis	0.6	\$ 297.00	Reviewed revised reply brief and telephone conference with litigation counsel regarding same.	L	Re	G

Date	ATTY/PARA.	Title	Hour	Amo	Description	COMMUNITY MATTER/LEGAL	PLEADING TYPE? RECORDS REQUI	GENERIC?
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.		Re	
05/02/25	Contrera, Jack H.	Associate	3.10	\$1,410.50	Continue drafting reply in support of motion to dismiss.		Re	
05/04/25	Contrera, Jack H.	Associate	1.60	\$728.00	Draft introduction and fact section of reply in support of motion to dismiss.		Re	
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.		Re	
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.		Re	
05/06/25	Roberts, Daniel G.	Partner	3.30	\$2,046.00	Continue drafting and revising reply in support of motion to dismiss.		Re	
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.		Re	
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.		Re	
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.		Re	
05/06/25	Stine, Lauren E.	Partner	1.20	\$744.00	Evaluate legal research for reply in support of motion to dismiss.		Re	
05/07/25	Contrera, Jack H.	Associate	1.60	\$728.00	Proofread and revise draft reply in support of motion to dismiss.		Re	
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.		Re	
05/07/25	Roberts, Daniel G.	Partner	2.30	\$1,426.00	Review and revise draft reply in support of motion to dismiss.		Re	
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.		Re	
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.		Re	
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		Re	
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.		Re	
05/08/25	Stine, Lauren E.	Partner	2.20	\$1,364.00	Work on final edits to reply in support of motion to dismiss.		Re	

EXHIBIT F-8

CHDB LAW

Date	Attorney/ Paralegal	Orig Hrs	Orig Am	Narrative	COMMUNITY MATTER/LEGAL MATTER	RECORDS REQUEST? PETITION?	GENERIC?
02/20/2025	Ekmark, Curtis	0.70	\$ 346.50	Telephone conference with litigation counsel and board president and community manager regarding	L	PI	G
02/20/2025	Ekmark, Curtis	5.90	\$ 2,920.50	Reviewed pleadings filed by Tom and Telephone conference with litigation counsel regarding same	L	PI	

EKMARK PECOR LAW

DATE	ATTY/PARA.	HOURS	AMOUNT	DESCRIPTION	COMMUNITY MATTER/LEGAL MATTER	LITIGATION ITEM? RECORDS REQUEST? PETITION?	GENERIC?
5/17/2025	Ekmark,Curtis	0.9	\$ 445.50	Reviewed draft of response to motion for injunction.	L	PI	
5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding witness declaration.	L	PI	G
5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding expense	L	PI	G
5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from community manager to litigation counsel regarding special meeting.	L	PI	G
5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email regarding mootness issue.	L	PI	G
5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed updated witness declaration.	L	PI	G
5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding exhibit.	L	PI	G
5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel regarding exhibits for	L	PI	G
5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed email from litigation counsel to witness.	L	PI	G
5/19/2025	Ekmark,Curtis	0.1	\$ 49.50	Reviewed filing by litigation counsel.	L	PI	G
5/19/2025	Ekmark,Curtis	0.8	\$ 396.00	Reviewed email from litigation counsel and revised response to	L	PI	G

16						temporary restraining order (2.0); review pleadings and client documents (.8); and perform legal research in connection with same (2.0).
19	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).
24	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 Evaluate legal research for response to temporary restraining order application.
30	02/21/25	Stine, Lauren E.	Partner	0.80	\$496.00	
31	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.
33	02/24/25	Roberts, Daniel G.	Partner	1.40	\$868.00	Begin drafting response in opposition to motion for order to show cause.
36	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.
44	03/04/25	Stine, Lauren E.	Partner	0.60	\$372.00	Evaluate and work on response to request for order to show cause.
47	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
49	03/05/25	Stine, Lauren E.	Partner	1.40	\$868.00	Revise response to application for order to show cause.
51	03/06/25	Roberts, Daniel G.	Partner	1.30	\$806.00	Review and revise draft response to application for order to show cause.
53	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).
158	04/14/25	Contrera, Jack H.	Associate	0.40	\$182.00	Begin drafting preliminary injunction application response.
162	04/14/25	Stine, Lauren E.	Partner	0.50	\$310.00	Review and analyze evidentiary support for application for preliminary injunction.
163	04/14/25	Stine, Lauren E.	Partner	0.80	\$496.00	Evaluate arguments for response to preliminary injunction application.
165	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.
167	04/15/25	Contrera, Jack H.	Associate	2.00	\$910.00	Draft introduction and factual background sections of response to application for preliminary injunction.
171	04/15/25	Stine, Lauren E.	Partner	1.00	\$620.00	Continue to work on preliminary injunction hearing and response strategy.
172	04/16/25	Contrera, Jack H.	Associate	5.30	\$2,411.50	Draft legal argument sections of response to application for preliminary injunction Application.
173	04/17/25	Contrera, Jack H.	Associate	0.80	\$364.00	Draft and revise response to application for preliminary injunction.
174	04/17/25	Contrera, Jack H.	Associate	2.00	\$910.00	Confer internally regarding response to application for preliminary injunction.
175	04/18/25	Contrera, Jack H.	Associate	0.50	\$227.50	Revise factual background section of response to application for preliminary injunction.
176	04/21/25	Contrera, Jack H.	Associate	0.30	\$136.50	Revise response to application for preliminary injunction.
181	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).
186	04/30/25	Roberts, Daniel G.	Partner	0.50	\$310.00	Review and revise draft response to application for preliminary injunction.
240	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.
241	05/12/25	Contrera, Jack H.	Associate	1.30	\$591.50	Review and prepare exhibits for same.
242	05/12/25	Contrera, Jack H.	Associate	1.80	\$819.00	Draft declarations for preliminary injunction production.
243	05/12/25	Roberts, Daniel G.	Partner	9.50	\$5,890.00	Draft response in opposition to application for preliminary injunction.
244	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.
247	05/13/25	Contrera, Jack H.	Associate	0.60	\$273.00	Continue legal research into issues raised in response to application for preliminary injunction.
248	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.
249	05/13/25	Roberts, Daniel G.	Partner	0.40	\$248.00	Strategize regarding revisions to draft response to application for preliminary injunction.
250	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.
251	05/13/25	Roberts, Daniel G.	Partner	4.30	\$2,666.00	Continue drafting response to application for preliminary injunction and supporting declarations.
252	05/13/25	Stine, Lauren E.	Partner	3.50	\$2,170.00	Review and revise substantive response to application for preliminary injunction.
253	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.
259	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).
263	05/15/25	Roberts, Daniel G.	Partner	3.60	\$2,232.00	Review and revise draft response to application for preliminary injunction.
272	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).
283	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.
293	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.
294	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.
296	05/18/25	Stine, Lauren E.	Partner	0.60	\$372.00	Revise declarations for response to preliminary injunction application.
297	05/19/25	Contrera, Jack H.	Associate	1.90	\$864.50	Proofread and cite check response to preliminary injunction pleading.
303	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.
307	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.
309	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.
404	Total					▼

EXHIBIT G

1 Arizona. He has been licensed to practice law in the State of Arizona since 1999 and
2 was subsequently licensed to practice law in the State of California in 2001. His
3 hourly rate in this matter was \$450.00 per hour.

4 8. Additionally, a paralegal Hilary Narveson also provided material
5 assistance in this case. She has considerable experience as a paralegal and normally
6 bills at a rate of \$240.00 per hour, which is consistent with the prevailing rates for
7 paralegals in the legal community.

8 9. I am familiar with the reasonable billing rates for legal services
9 rendered. In this matter, the rates charged to Plaintiff were reasonable within the
10 Arizona legal community for services in this type of matter rendered in light of the
11 ability, training, education, and experience of the attorneys.

12 10. I have reviewed Exhibit 1 and the electronic records from which they
13 were produced. These itemizations were created from billing records that are
14 regularly prepared in the course of my firm's business.

15 11. As a result of this action, Plaintiff has incurred \$123,319.00 in attorneys'
16 fees for professional services rendered.

17 I hereby declare under the penalty of perjury that the foregoing is true and
18 correct.

19 EXECUTED on 8/20/2025.

20 Signed by:
David Wood
21 55A5A9B071D9471
22 DAVID E. WOOD

EXHIBIT 1

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
11/19/24	Hilary Narveson	Begin draft of Complaint.	\$240.00	0.3	\$72.00
11/20/24	Joseph Halow	Continue researching and analyzing claims and causes of action.	\$225.00	1.1	\$247.50
11/22/24	Joseph Halow	Begin drafting complaint.	\$225.00	0.8	\$180.00
11/25/24	Joseph Halow	Meet w/ J. Dessaulles and H. Narveson regarding case status.	\$225.00	0.1	\$22.50
12/10/24	Jonathan Dessaulles	Emails with C. Ekmark.	\$450.00	0.1	\$45.00
12/16/24	Joseph Halow	Continue drafting complaint.	\$225.00	3.3	\$742.50
12/17/24	Joseph Halow	Continue reviewing client file, compiling materials, drafting complaint.	\$225.00	1.8	\$405.00
12/18/24	Joseph Halow	Case strategy meeting.	\$225.00	0.1	\$22.50
12/30/24	Joseph Halow	Continue drafting complaint.	\$225.00	3.9	\$877.50
1/6/25	Joseph Halow	Call w/ client to	\$225.00	0.2	\$45.00
1/9/25	Hilary Narveson	Telephone call to client	\$240.00	0.1	\$24.00
1/10/25	Joseph Halow	Follow up on client's	\$225.00	0.2	\$45.00
1/10/25	Hilary Narveson	Revise and edit draft of Complaint.	\$240.00	0.5	\$120.00
1/13/25	Hilary Narveson	Continue to review, revise and edit complaint.	\$240.00	1.7	\$408.00
1/13/25	Joseph Halow	Add finishing touches to draft of complaint.	\$225.00	0.4	\$90.00
1/14/25	Jonathan Dessaulles	Revise and edit complaint.	\$450.00	1.6	\$720.00
1/15/25	Hilary Narveson	Meet with J. Dessaulles and J. Halow and discuss status of draft Complaint and the need for additional information from client.	\$240.00	0.2	\$48.00
1/15/25	Joseph Halow	Continue drafting complaint. Gathering evidence to support our allegations, and determining what we will need in discovery.	\$225.00	1.7	\$382.50
1/16/25	Joseph Halow	Talk with client about revisions to complaint.	\$225.00	0.6	\$135.00
1/19/25	Jonathan Dessaulles	Emails with client regarding	\$450.00	0.2	\$90.00
1/20/25	Joseph Halow	Talk with client about	\$225.00	0.7	\$157.50
1/21/25	Joseph Halow	Discuss finishing touches on complaint. Strategize	\$225.00	0.2	\$45.00
1/21/25	Hilary Narveson	Review, revise and edit draft of Complaint and gather exhibits thereto.	\$240.00	1.1	\$264.00
1/22/25	Hilary Narveson	Revise and finalize Complaint; gather exhibits and draft Certificate of Compulsory Arbitration for filing.	\$240.00	0.6	\$144.00
1/23/25	Hilary Narveson	Review and analyze conformed copies of Complaint, Certificate of Compulsory Arbitration and issued Summons; update docket with service deadline and email J. Dessaulles and J. Halow regarding service; email client regarding service address and send out same for service.	\$240.00	0.3	\$72.00
1/27/25	Jonathan Dessaulles	Emails with Curtis regarding service.	\$450.00	0.1	\$45.00
1/27/25	Joseph Halow	Phone call regarding	\$225.00	0.2	\$45.00
1/29/25	Joseph Halow	Phone call with client regarding	\$225.00	0.3	\$67.50
1/29/25	Hilary Narveson	Review and analyze various mediators availability for mediation and discuss same with J. Dessaulles and J. Halow.	\$240.00	0.3	\$72.00
1/30/25	Jonathan Dessaulles	Emails with client regarding	\$450.00	0.2	\$90.00
2/3/25	Joseph Halow	Phone call with Tom	\$225.00	0.2	\$45.00

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
2/4/25	Joseph Halow	Review materials provided by client. Determine next steps and strategize motion for summary judgement on issue of indemnification.	\$225.00	0.2	\$45.00
2/6/25	Joseph Halow	Discuss next steps in the case, strategy surrounding answer deadline, Temporary Restraining Order seeking to stall enforcement of the Grand Standards.	\$225.00	0.3	\$67.50
2/7/25	Joseph Halow	Phone call with client.	\$225.00	0.3	\$67.50
2/10/25	Joseph Halow	Call client to follow up with earlier missed call.	\$225.00	0.3	\$67.50
2/11/25	Hilary Narveson	Review and compare various mediators availability for March mediation and refer to Firm's availability; email to J. Dessaulles and J. Halow regarding same.	\$240.00	0.6	\$144.00
2/11/25	Hilary Narveson	Telephone call with client regarding	\$240.00	0.2	\$48.00
2/12/25	Hilary Narveson		\$240.00	0.2	\$48.00
2/13/25	Joseph Halow	Phone calls with client, draft application for TRO.	\$225.00	7.5	\$1,687.50
2/13/25	Hilary Narveson	Begin drafting Application and Memorandum for Temporary Restraining Order, proposed Temporary Restraining Order, Application for Order to Show Cause, and proposed Order; email same to J. Halow for further revisions.	\$240.00	0.6	\$144.00
2/13/25	Jonathan Dessaulles	Review email regarding complaint from Ted Grove.	\$450.00	0.1	\$45.00
2/13/25	Hilary Narveson	Meet with J. Dessaulles and J. Halow and discuss the need to file temporary restraining order documents and potential default.	\$240.00	0.1	\$24.00
2/14/25	Hilary Narveson	Review, revise, edit and format the Memorandum in Support of Temporary Restraining Order and email to J. Halow for further revisions.	\$240.00	0.5	\$120.00
2/15/25	Joseph Halow	Continue drafting Application for Temporary Restraining Order.	\$225.00	0.4	\$90.00
2/16/25	Joseph Halow	Finish drafting TRO.	\$225.00	2.2	\$495.00
2/16/25	Jonathan Dessaulles	Work on TRO and preliminary injunction application.	\$450.00	1.5	\$675.00
2/17/25	Jonathan Dessaulles	Revise and edit application for TRO/PI.	\$450.00	4.3	\$1,935.00
2/17/25	Jonathan Dessaulles	Emails with client regarding	\$450.00	0.2	\$90.00
2/18/25	Hilary Narveson	Review and analyze Client's emails concerning and prepare list of potential witnesses or declarants and discuss with J. Halow.	\$240.00	0.9	\$216.00
2/18/25	Hilary Narveson	Begin draft of Amended Complaint.	\$240.00	0.3	\$72.00
2/18/25	Hilary Narveson	Begin draft of Declaration of Client and Declaration for L. Myrick.	\$240.00	0.5	\$120.00
2/18/25	Hilary Narveson	Discuss updates and procedures for filing the amended complaint and the temporary restraining documents with J. Halow.	\$240.00	0.3	\$72.00
2/18/25	David Wood	Reviewed current draft of the application for temporary restraining order and outlined arguments to add, rewrite, and reorganize.	\$385.00	1	\$385.00
2/19/25	Joseph Halow	Finalize temporary restraining order, preparing it to potentially serve as application for preliminary injunction, and coordinating it with amended complaint; prepare, edit, and finalize other relevant filing documents.	\$225.00	9.7	\$2,182.50
2/19/25	David Wood	Revised and rewrote sections of the application for temporary restraining order and looked up for reference sections of the nonprofit statutes. Left comments for discussion with team.	\$385.00	2	\$770.00
2/19/25	David Wood	Meeting with J. Hallow and H. Narveson to discuss necessary declarations for application and timing of drafts and filing.	\$385.00	0.2	\$77.00

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
2/19/25	Hilary Narveson	Discuss plan of action for temporary restraining order papers and amended complaint filings with D. Wood and J. Halow.	\$240.00	0.3	\$72.00
2/19/25	Hilary Narveson	Begin draft of new declaration for potential witness per client email.	\$240.00	0.2	\$48.00
2/19/25	Hilary Narveson	Review, revise and edit Application and Memorandum for Temporary Restraining Order and emails with J. Dessaulles, D. Wood, and J. Halow regarding same.	\$240.00	1.1	\$264.00
2/19/25	David Wood	Continued writing, editing, and rewriting application for temporary restraining order and preliminary injunction, proposed order to show cause, and application for order to show cause. (6) Meetings and discussions with J. Hallow and H. Narveson and J. Dessaulles to review filings, plan, and ability to get court hearing before Monday. (2)	\$385.00	8	\$3,080.00
2/20/25	David Wood	Rewrote application for order to show cause, prayer for relief in amended complaint, and application for preliminary injunction.	\$385.00	1	\$385.00
2/20/25	Joseph Halow	Work on TRO proposed order.	\$225.00	0.3	\$67.50
2/20/25	Hilary Narveson	Review, revise and edit Amended Complaint; gather and prepare exhibits thereto and file the same.	\$240.00	1.5	\$360.00
2/20/25	Sara Bryant	Revise Motion to Exceed Page Limitation (0.2); Draft Proposed Order in connection to the same (0.2).	\$150.00	0.5	\$75.00
2/20/25	Lisa Lopez	Review Application for Order to Show Cause; proposed Order and Temporary Restraining Order; and draft Motion to Exceed Page Limitation; and confer with H. Narveson and S. Bryant regarding same.	\$185.00	0.7	\$129.50
2/20/25	Hilary Narveson	Review, revise, finalize and file the Application and Memorandum in Support of Temporary Restraining Order, exhibits thereto, proposed order, Application for Order to Show Cause and proposed Order, and Motion to Exceed Page Limitation and proposed Order.	\$240.00	3.1	\$744.00
2/20/25	David Wood	Multiple meetings with J. Dessaulles and H. Narveson to coordinate the filings. (.5) Reviewed and edited final filings and draft orders. (1)	\$385.00	1.5	\$577.50
2/21/25	David Wood	Reviewed court entry of return hearing date after the election. Emailed J. Dessaulles.	\$385.00	0.2	\$77.00
2/24/25	Hilary Narveson	Email client with information on scheduled order to show cause and with a copy of the order.	\$240.00	0.1	\$24.00
2/25/25	Hilary Narveson	Discuss service of Order to Show Cause and documents on counsel for Defendant with J. Dessaulles and D. Wood; email opposing counsel with all documents.	\$240.00	0.2	\$48.00
2/27/25	Lisa Lopez	Receipt and review Court's Minute regarding signed Order granting Motion to Exceed Page Limitation; review Court Docket and download Order; and distribute to team.	\$185.00	0.2	\$37.00
2/27/25	David Wood	Call with defense counsel about next week's return hearing, possible agreement to a preliminary injunction hearing date and disclosures of documents for the same.	\$385.00	0.2	\$77.00
3/3/25	Joseph Halow	Review emails, client file, pleadings and other communications.	\$225.00	0.4	\$90.00
3/4/25	Joseph Halow	Discuss next steps with David Wood. Proposal for moving case forward, discovering additional documents regarding recall.	\$225.00	0.3	\$67.50
3/4/25	Hilary Narveson	Email to J. Dessaulles, D. Wood and J. Halow regarding upcoming hearing and rescheduling the same; meet and discuss same with J. Halow and potential need to prepare stipulation.	\$240.00	0.1	\$24.00
3/5/25	Hilary Narveson	Meet with J. Halow and discuss the upcoming hearing and our next steps; email to team regarding same.	\$240.00	0.1	\$24.00

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
3/5/25	Joseph Halow	Phone call with client regarding	\$225.00	0.7	\$157.50
3/6/25	Joseph Halow	Confer with David Wood and Jon Dessaulles about Friday hearing, scope of records request, plans for the case moving forward.	\$225.00	0.4	\$90.00
3/6/25	Joseph Halow	Draft demand letter for recal record production.	\$225.00	0.6	\$135.00
3/6/25	Jonathan Dessaulles	Review response to OSC.	\$450.00	0.3	\$135.00
3/6/25	David Wood	Meeting with J. Dessaulles and J. Halow to plan for the return hearing.	\$385.00	0.1	\$38.50
3/6/25	David Wood	Wrote email to defense counsel with more details and proposed timelines for a preliminary injunction hearing.	\$385.00	0.1	\$38.50
3/6/25	David Wood	Revised letter making statutory demand for records from the HOA. Emailed to defense counsel.	\$385.00	0.3	\$115.50
3/7/25	David Wood	Prepare and outline for argument at return hearing.	\$385.00	1.2	\$462.00
3/7/25	Joseph Halow	OSC preparation and hearing.	\$225.00	1.5	\$337.50
3/7/25	Lisa Lopez	Receipt and review Response to Application for Order to Show Cause; confer with D. Wood regarding same; and telephone call to Court regarding TRO hearing delay.	\$185.00	0.3	\$55.50
3/7/25	Hilary Narveson	Review and analyze document request letter form D. Wood and update docket with Association deadline.	\$240.00	0.1	\$24.00
3/7/25	Hilary Narveson	Emails with client regarding order to show cause hearing.	\$240.00	0.1	\$24.00
3/7/25	David Wood	Attended and argued at TRO return hearing.	\$385.00	0.3	\$115.50
3/7/25	David Wood	Meeting with J. Dessaulles and J. Hallow regarding TRO return hearing and how best to obtain discovery and when to issue demands.	\$385.00	0.1	\$38.50
3/7/25	David Wood	Phone call with client and J. Hallow	\$385.00	0.2	\$77.00
3/10/25	Joseph Halow	Phone call with Tom.	\$225.00	0.2	\$45.00
3/11/25	Joseph Halow	Discuss/strategize motion for summary judgment	\$225.00	0.1	\$22.50
3/13/25	Hilary Narveson	Review and analyze the Court's recent minute entry scheduling the evidentiary hearing and update docket with all relevant deadlines.	\$240.00	0.1	\$24.00
3/18/25	Hilary Narveson	Review and analyze email from Opposing Counsel; draft Verification to Amended Complaint and circulate to D. Wood for consideration; email same to client.	\$240.00	0.5	\$120.00
3/18/25	Hilary Narveson	Draft Notice of Filing Verification and email to D. Wood for approval; finalize and file the same.	\$240.00	0.4	\$96.00
3/21/25	Joseph Halow	Review Defendant's document production.	\$225.00	1.4	\$315.00
3/21/25	David Wood	Reviewed documents disclosed by the HOA to do a rough count of what they relied upon for signatures to a petition and how many signatures the HOA obtained, by their actions.	\$385.00	0.6	\$231.00
3/24/25	Joseph Halow	Review voicemail from client, review materials received in Defendant's document production, and follow up.	\$225.00	1.6	\$360.00
3/24/25	Hilary Narveson	Discuss email vote documents with D. Wood and begin spreadsheet regarding same; review and compare information on spreadsheet with emails.	\$240.00	0.7	\$168.00
3/24/25	David Wood	Call with client and J. Hallow	\$385.00	1	\$385.00
3/24/25	David Wood	Made a chart of electronic signatures requirements and allowances for comparison with Title 33 Petition requirements.	\$385.00	0.3	\$115.50
3/24/25	David Wood	Reviewed complaint and CC&R's in preparation for phone call with client.	\$385.00	0.2	\$77.00

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
3/26/25	Joseph Halow	Discuss next steps, legal outline and arguments, potential motion for summary judgment.	\$225.00	0.1	\$22.50
3/26/25	Hilary Narveson	Review and analyze email votes produced by Association and update spreadsheet.	\$240.00	1.2	\$288.00
3/27/25	Joseph Halow	Outline legal argument for potential MSJ.	\$225.00	0.7	\$157.50
4/1/25	Joseph Halow	Phone call with client to discuss strategy moving forward.	\$225.00	0.5	\$112.50
4/1/25	David Wood	Call with J. Hallow and client	\$385.00	0.5	\$192.50
4/1/25	David Wood	Legal research for qualified immunity and absolute immunity for various types of speech. (.2)	\$385.00	0.9	\$346.50
4/1/25	Hilary Narveson	Continue to review and analyze email votes and update spreadsheet; send same to D. Wood and J. Halow.	\$240.00	1.9	\$456.00
4/10/25	Jonathan Dessaules	Preliminary review and analysis of defendant's motion to dismiss.	\$450.00	0.7	\$315.00
4/10/25	Joseph Halow	Review opposing party's motion to dismiss.	\$225.00	0.7	\$157.50
4/10/25	David Wood	Meeting with J. Dessaules and J. Hallow to plan for the response and materials to request for the hearing.	\$385.00	0.2	\$77.00
4/11/25	Joseph Halow	Phone call with client	\$225.00	0.2	\$45.00
4/14/25	Joseph Halow	Research and begin drafting response to motion to dismiss.	\$225.00	1.3	\$292.50
4/15/25	Joseph Halow	Continue drafting response to motion to dismiss.	\$225.00	7.2	\$1,620.00
4/16/25	Joseph Halow	Continue to draft response to motion to dismiss/mpsj.	\$225.00	7.7	\$1,732.50
4/16/25	David Wood	Call with J. Hallow and client	\$385.00	0.3	\$115.50
4/16/25	David Wood	Meeting with J. Hallow to review substance of the motion to dismiss and arguments in response.	\$385.00	0.2	\$77.00
4/17/25	Joseph Halow	Continue working on response to motion to dismiss.	\$225.00	6.3	\$1,417.50
4/18/25	David Wood	Begin reviewing and revising response to motion to dismiss.	\$385.00	0.7	\$269.50
4/22/25	David Wood	Wrote and sent instructions to J. Hallow for continued drafting needs for motion for partial summary judgment.	\$385.00	0.2	\$77.00
4/23/25	Joseph Halow	Compile independant statement of facts for MSJ.	\$225.00	7	\$1,575.00
4/23/25	Hilary Narveson	Discuss status of response to motion to dismiss, extension thereto, and combined motion for partial summary judgment with J. Halow and D. Wood; research Judge's protocols and procedures and circulate same to attorneys.	\$240.00	0.5	\$120.00
4/23/25	Hilary Narveson	Begin draft of Notice of Extension to File Response to Motion to Dismiss and send to attorneys for consideration; finalize and file the same.	\$240.00	0.5	\$120.00
4/24/25	Joseph Halow	Work on synthesizing arguments for response to motion to dismiss.	\$225.00	4.1	\$922.50
4/24/25	Hilary Narveson	Review and analyze email from J. Halow regarding response to motion to dismiss and discuss same with him and D. Wood.	\$240.00	0.2	\$48.00
4/24/25	David Wood	Continued writing response to motion to dismiss. Legal research for rules allowing extrinsic materials in motion to dismiss based on jurisdiction, limitations to that exception, and general motion to dismiss standards. Reviewed and incorporated grand standards into response outlining how they were speech inhibiting provisions.	\$385.00	9	\$3,465.00

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
4/25/25	Joseph Halow	Phone call with client	\$225.00	2.3	\$517.50
4/25/25	Jonathan Dessaulles	Revise and edit response to motion to dismiss.	\$450.00	6.7	\$3,015.00
4/25/25	Hilary Narveson	Discuss status of Response to Motion to Dismiss with J. Halow and D. Wood; review draft and discuss same with L. Lopez.	\$240.00	0.3	\$72.00
4/25/25	David Wood	Reviewed J. Dessaulles's edits and included new definitions and links to definitions in the draft. Located record citations and incorporated into the draft.	\$385.00	3.2	\$1,232.00
4/25/25	Lisa Lopez	Review and revise Response to Motion to Dismiss; confer with D. Wood and H. Narveson regarding finalizing same; finalize and file Response to Motion to Dismiss; email to opposing counsel; and update calendar accordingly.	\$185.00	0.8	\$148.00
4/28/25	Joseph Halow	Meet internally to strategize filings after response to motion to dismiss.	\$225.00	0.5	\$112.50
4/28/25	Joseph Halow	Review client file, identify exhibits for forthcoming filings, identify information needed in discovery.	\$225.00	2.3	\$517.50
4/28/25	David Wood	Meeting with J. Halow and J. Dessaulles to plan discovery requests and preparation for injunction hearing.	\$385.00	0.2	\$77.00
4/29/25	Joseph Halow	Meet internally to discuss information to obtain from review of recall materials, strategize next court filing/our approach to the upcoming hearing.	\$225.00	0.3	\$67.50
4/29/25	Hilary Narveson	Meet with J. Dessaulles and J. Halow to discuss case status, need for preparation for evidentiary hearing and further discussions with D. Wood.	\$240.00	0.1	\$24.00
5/1/25	Hilary Narveson	Begin draft of letter to follow up with counsel as to records for J. Halow.	\$240.00	0.2	\$48.00
5/1/25	Joseph Halow	Analyze vote spreadsheet, identify relevant metrics for motion to claims to overturn recall election.	\$225.00	2.1	\$472.50
5/1/25	Hilary Narveson	Review, revise and edit follow-up correspondence to L. Stine; finalize and send out the same.	\$240.00	0.4	\$96.00
5/6/25	Joseph Halow	Phone call with client.	\$225.00	0.4	\$90.00
5/6/25	David Wood	Call with client and J. Halow	\$385.00	0.3	\$115.50
5/6/25	Joseph Halow	Meet internally to discuss witnesses for hearing, means of contacting those witnesses.	\$225.00	0.2	\$45.00
5/6/25	Hilary Narveson	Meet with D. Wood and J. Halow and discuss upcoming hearing, need for subpoenas, scheduling telephone calls, potential exhibits and bench brief.	\$240.00	0.3	\$72.00
5/6/25	David Wood	Meeting with H. Narveson and J. Halow to outline our known exhibits and witness subpoenas for the evidentiary hearing. Discussed format of a demonstrative exhibit outlining issues with claimed signatures for a recall petition.	\$385.00	0.2	\$77.00
5/7/25	Hilary Narveson	Discuss next steps again for preparation of hearing with D. Wood and J. Halow; update J. Dessaulles regarding same.	\$240.00	0.2	\$48.00
5/8/25	Joseph Halow	Discuss bench brief to draft.	\$225.00	0.1	\$22.50
5/9/25	Joseph Halow	Review Defendant's reply to Response to Motion to Dismiss.	\$225.00	0.4	\$90.00
5/9/25	Joseph Halow	Continue reviewing Defendant's reply, circulate to client, strategize for hearing.	\$225.00	0.2	\$45.00
5/12/25	Joseph Halow	Find contact information for prospective witnesses to subpoena; sit in on phone calls of witnesses; prepare bench brief to supplement exhibits for hearing.	\$225.00	1.3	\$292.50

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
5/12/25	David Wood	Call with potential witness Nancy Collins	\$385.00	0.2	\$77.00
5/13/25	Joseph Halow	Phone call with client regarding new number for Lynn Myrick and proposed strategy for approaching him to be a witness.	\$225.00	0.1	\$22.50
5/13/25	Joseph Halow	Continue drafting bench brief in advance of hearing.	\$225.00	0.6	\$135.00
5/14/25	Joseph Halow	Review evidence; draft bench brief for upcoming hearing.	\$225.00	7.2	\$1,620.00
5/14/25	Sara Bryant	Confer with H. Narveson and J. Halow concerning subpoenas to be issued, analyze witnesses requested for appearance, issue subpoenas for the same.	\$150.00	0.6	\$90.00
5/14/25	Hilary Narveson	Meet with J. Dessaulles, D. Wood, J. Halow, and S. Izicki regarding preparations for the hearing and next steps.	\$240.00	1	\$240.00
5/14/25	Jonathan Dessaulles	Ongoing preparation for hearing, including review of emails constituting "signatures," continue analyzing emails produced to determine issues to raise at trial.	\$450.00	13.8	\$6,210.00
5/15/25	Joseph Halow	Review emails to determine "signature" count.	\$225.00	12.5	\$2,812.50
5/15/25	Hilary Narveson	Discuss service of subpoenas with attorneys and send out same for rush service with process server.	\$240.00	0.3	\$72.00
5/15/25	Hilary Narveson	Discuss exhibits for hearing with attorneys and begin gathering the same.	\$240.00	0.7	\$168.00
5/15/25	Hilary Narveson	Begin draft of List of Witnesses and Exhibits.	\$240.00	0.3	\$72.00
5/15/25	Hilary Narveson	Begin draft of Stipulation and proposed Order to Continue Deadlines; discuss same with D. Wood; finalize and file the same.	\$240.00	0.7	\$168.00
5/15/25	David Wood	Meeting with J. Dessaulles, J. Halverson, H. Narveson, and S. Izicki to review the emails from the HOA, categorize them, and determine how to bundle them for the evidentiary hearing. Phone call with opposing counsel regarding delay of evidence upload and any list of alleged signatures to the petition. (.2) Discussed lack of disclosure of signatories with J. Dessaulles and decided to add me as a witness. (.2)	\$385.00	2.5	\$962.50
5/15/25	Hilary Narveson	Meet with D. Wood and J. Halow and discuss status of spreadsheet and gathering of exhibits.	\$240.00	0.3	\$72.00
5/15/25	Lisa Lopez	Confer with H. Narveson regarding issuing subpoena for C. Ekmark's appearance at hearing; draft subpoena; and confer with D. Wood and H. Narveson regarding same.	\$185.00	0.2	\$37.00
5/15/25	David Wood	Call with Association counsel regarding my request for their records of signatures and whether they would provide that information.	\$385.00	0.2	\$77.00
5/15/25	David Wood	Traded emails with Association counsel regarding viewing the Petitions and whether they had records different than what they had produced. Reviewed letter from counsel offering a viewing of new records and responded with demand that they email copies.	\$385.00	0.2	\$77.00
5/15/25	David Wood	Rewrote bench brief. Legal research for cases analyzing emails as electronic signatures. (.5)	\$385.00	6	\$2,310.00
5/15/25	Jonathan Dessaulles	Continue preparing for evidentiary hearing.	\$450.00	12.3	\$5,535.00
5/15/25	Lisa Lopez	Draft Subpoena for C. Ekmark appearance at hearing; and confer with H. Narveson regarding same.	\$185.00	0.4	\$74.00
5/16/25	Joseph Halow	Coordinate submission of exhibits, other last steps before disclosure for Thursday hearing.	\$225.00	3.8	\$855.00
5/16/25	Sara Bryant	Prepare exhibits for hearing preparation, confer with case team concerning the same.	\$150.00	1.7	\$255.00
5/16/25	Hilary Narveson	Review, analyze, gather and prepare exhibits to be submitted to the Court; update, finalize, and file the List of Witnesses and Exhibits.	\$240.00	3.9	\$936.00

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
5/16/25	Valerie Kennedy	Assist in exhibit preparation.	\$225.00	0.1	\$22.50
5/16/25	Hilary Narveson	Review, revise, and finalize Bench Brief for filing; telephone call to Turbo Court regarding same and email to chambers and counsel with brief.	\$240.00	0.6	\$144.00
5/16/25	Jonathan Dessaulles	Revise and edit bench memorandum.	\$450.00	2.6	\$1,170.00
5/16/25	Jonathan Dessaulles	Assist with witness identification and organization; review and approve witness and exhibit list.	\$450.00	2	\$900.00
5/19/25	Joseph Halow	Speak with client	\$225.00	0.4	\$90.00
5/19/25	Hilary Narveson	Review and file the Bench Brief.	\$240.00	0.3	\$72.00
5/19/25	Hilary Narveson	Review and analyze Defendant's exhibits and email same to client.	\$240.00	0.1	\$24.00
5/20/25	Hilary Narveson	Review and analyze Response to Application for Preliminary Injunction; update docket with reply deadline and email attorneys regarding same and preparation for hearing.	\$240.00	0.1	\$24.00
5/20/25	Joseph Halow	Review Defendant's response to application for preliminary injunction. Continue analyzing data for inconsistencies.	\$225.00	7.8	\$1,755.00
5/20/25	Jonathan Dessaulles	Continue preparing for hearing.	\$450.00	4.1	\$1,845.00
5/21/25	Joseph Halow	Continue hearing preparation; prepare certain data figures from exhibits.	\$225.00	12.3	\$2,767.50
5/21/25	Sara Bryant	Analyze and compare exhibits. (2.5); Trial Preparation (5.8)	\$150.00	8.4	\$1,260.00
5/21/25	Hilary Narveson	Compare and analyze our exhibits to Defendant's exhibits for duplication and provide attorneys with the same information.	\$240.00	0.7	\$168.00
5/21/25	Ashley Hill	Review and revise oral argument outline.	\$360.00	6.6	\$2,376.00
5/21/25	Jonathan Dessaulles	Prepare for hearing.	\$450.00	12.5	\$5,625.00
5/21/25	Hilary Narveson	Gather and prepare evidentiary hearing exhibits for J. Dessaulles' review and preparation.	\$240.00	0.9	\$216.00
5/22/25	Ashley Hill	Continue preparing oral argument outline.	\$360.00	2.7	\$972.00
5/22/25	Joseph Halow	Hearing prep; hearing.	\$225.00	2.6	\$585.00
5/22/25	Jonathan Dessaulles	Continue preparing for hearing; attend hearing.	\$450.00	3.5	\$1,575.00
5/22/25	David Wood	Drove to and from court for evidentiary hearing.	\$385.00	0.6	\$231.00
5/22/25	David Wood	Attended court argument held in lieu of hearing. Made notes for J. Dessaulles arguing to the court and advised on our plan given court's concerns about the emails and volume of emails in evidence.	\$385.00	1.3	\$500.50
5/22/25	David Wood	Multiple meetings with J. Dessaulles and J. Halow regarding plans to present our arguments and case to the court.	\$385.00	0.3	\$115.50
5/27/25	Joseph Halow	Review emails to determine effective pleading attachments.	\$225.00	5.3	\$1,192.50
5/28/25	Joseph Halow	Begin drafting reply to response to motion for TRO.	\$225.00	7.1	\$1,597.50
5/28/25	Joseph Halow	Meet w/ J. Dessaulles, D. Wood to strategize motion for summary judgment, delegate responsibilities for attorneys on case.	\$225.00	0.5	\$112.50
5/29/25	Joseph Halow	Continue drafting reply, compiling demonstrative emails for filings, strategizing motion for summary judgment.	\$225.00	6	\$1,350.00
5/29/25	Hilary Narveson	Discuss status of draft reply with J. Halow and revise and edit current draft.	\$240.00	0.3	\$72.00
5/30/25	David Wood	Continued edits to the Reply brief.	\$385.00	2.2	\$847.00
6/2/25	Joseph Halow	Input certain numbers to contribute to newest draft of Reply.	\$225.00	1.4	\$315.00
6/2/25	Hilary Narveson	Begin drafts of Declarations for T. Gusich and L. Myrick for D. Wood to revise.	\$240.00	0.4	\$96.00
6/2/25	Hilary Narveson	Review and analyze the minute entry continuing the evidentiary hearing and update docket to reflect the same.	\$240.00	0.1	\$24.00

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
6/2/25	Hilary Narveson	Review, revise and edit Reply in Support of Application for Preliminary Injunction; email same to attorneys for consideration; finalize and file the same.	\$240.00	1.5	\$360.00
6/2/25	David Wood	Reviewed and edited J. Hallow's draft reply and reviewed and edited staff edits for finalization of Reply. Wrote, reviewed, and edited declarations to include with the Reply.	\$385.00	2.3	\$885.50
6/6/25	Hilary Narveson	Review and analyze email between client and attorneys; schedule conference call and circulate information regarding same to client.	\$240.00	0.1	\$24.00
6/10/25	Joseph Halow	Phone call with D. Wood and client.	\$225.00	0.8	\$180.00
6/11/25	Joseph Halow	Begin compiling previous materials to commence drafting motion for summary judgment.	\$225.00	6.3	\$1,417.50
6/11/25	David Wood	Multiple meetings with J. Hallow to outline motion for summary judgment and whether to address anticipated arguments. Meeting with H. Narveson to outline how to produce exhibits and link to them in motion for summary judgment.	\$385.00	0.3	\$115.50
6/11/25	Joseph Halow	Discuss strategy for motion for summary judgment, and identify exhibits to be included in initial filing.	\$225.00	0.2	\$45.00
6/12/25	Joseph Halow	Continue to draft MSJ	\$225.00	6.2	\$1,395.00
6/12/25	David Wood	Legal research for definitions and court treatment of terms in the Grand Standards, court findings of vagueness and overbreadth for those terms, common law duties of corporate directors and standards of conduct interfering with those duties.	\$385.00	3	\$1,155.00
6/13/25	Joseph Halow	Continue to draft motion for summary judgment.	\$225.00	4.7	\$1,057.50
6/13/25	Joseph Halow	Meet internally to discuss items needed for Motion for Summary Judgment.	\$225.00	0.1	\$22.50
6/16/25	Joseph Halow	Continue drafting MSJ. Submit to David Wood for review.	\$225.00	4.1	\$922.50
6/17/25	David Wood	Continued writing motion for summary judgment. Legal research for common law duties of board of directors and cases holding that inconsistent application of discretion was actionable. (1)	\$385.00	7	\$2,695.00
6/18/25	Joseph Halow	Compile materials for MSJ Exhibits; Continue drafting MSJ; Draft independent statement of facts in support of MSJ.	\$225.00	9.6	\$2,160.00
6/18/25	Hilary Narveson	Discuss exhibits with J. Halow; begin preparing and gathering exhibits for statement of facts	\$240.00	0.9	\$216.00
6/18/25	David Wood	Legal research for interpretation of indemnification provisions and for the common law standards for duties and fiduciary duties of corporate board members.	\$385.00	2	\$770.00
6/19/25	Joseph Halow	Continue drafting motion for summary judgment.	\$225.00	2.9	\$652.50
6/20/25	Joseph Halow	Continue drafting independent statement of facts. Identify evidentiary deficiencies we need to cover with declaration from client.	\$225.00	6.4	\$1,440.00
6/21/25	David Wood	Legal research for various interpretations and expressions of the duties of corporate boards of directors, how disagreements are viewed, and the requirements of due diligence to fulfill duties. Located cases and second sources and began incorporating into draft motion for summary judgment.	\$385.00	1.7	\$654.50
6/21/25	David Wood	Began rewrite of motion for summary judgment.	\$385.00	3	\$1,155.00
6/22/25	David Wood	Continued revising motion for summary judgment. Legal research for additional cases examining due diligence requirement of director fiduciary duties. (1) Began rewriting separate statement of facts with references to client documents and notes for allegations made against him.	\$385.00	6	\$2,310.00

Date	User	Description	Rate (per hr)	Billable Time	Billable Amount
6/23/25	Hilary Narveson	Discuss case and meeting with J. Halow; email client scheduling conference call and circulate necessary information.	\$240.00	0.1	\$24.00
6/23/25	Joseph Halow	Phone call with client regarding motion for summary judgment and hearing approach.	\$225.00	0.5	\$112.50
6/23/25	David Wood	Prepared for oral argument on the motion to dismiss. Reread all filings in the case and made detailed outline. Legal research for timing of statutory amendments for argument, and member standing to file suit for injunction.	\$385.00	5.5	\$2,117.50
6/24/25	Joseph Halow	Prepare for and attend hearing on motion to dismiss.	\$225.00	1.5	\$337.50
6/24/25	David Wood	Drove to and from court for oral argument on motion to dismiss.	\$385.00	0.6	\$231.00
6/24/25	David Wood	Oral argument on the motion to dismiss.	\$385.00	1.2	\$462.00
6/24/25	David Wood	Legal research for applicable statutes and other statutes expected to be argued by the Association to include in oral argument outline and notes, and additional cases stating various canons of statutory interpretation expected to be argued by the Association. Incorporated into oral argument outline and notes.	\$385.00	2.2	\$847.00
6/25/25	Joseph Halow	Work on building a more robust statement of facts, focusing on reducing vagueness of allegations related to Tom's 2024 stint as director and early disciplinary proceedings.	\$225.00	1.6	\$360.00
6/26/25	Joseph Halow	Go through client file. Identify exhibits to match information in Statement of facts. Also identify information needed from client's declaration.	\$225.00	1.9	\$427.50
7/8/25	Joseph Halow	Continue work on independent statement of facts.	\$225.00	1.5	\$337.50
7/14/25	David Wood	Reviewed again the court's minute entry dismissing the case in preparation for meeting with the client	\$385.00	0.2	\$77.00
7/14/25	Joseph Halow	Phone call with client	\$225.00	0.7	\$157.50
7/14/25	David Wood	Legal research for history of the HOA statutes at issue, history of Corporation statutes at issue, and conflict analysis ignored by the court.	\$385.00	0.4	\$154.00
7/14/25	David Wood	Call with client,	\$385.00	0.7	\$269.50
TOTALS:				417.7	\$123,319.00