

# **EXHIBIT 1**



preserve confidential information or work product), and the time spent in tenths of an hour submitted to PFP's insurance carrier for payment.

6. The hourly rates charged to PFP's insurance carrier, vary depending on the experience and expertise of the attorney working on the matter.
7. The records maintained by the lawyers at Garrey, Woner, Hoffmaster & Peshek, are entered into a time and billing system where the information is stored and processed to generate billing statements. The bill is reviewed by the attorneys on the case before it is sent to the client.
8. These practices are standard for Garrey, Woner, Hoffmaster & Peshek and are within its normal business operations.
9. The attorneys' fees set forth in the Invoice Printout were billed to PFP's insurance carrier as they were incurred and the rates charged are well below the rates charged by other laws firms in Maricopa County, Arizona.
10. Additionally, the hourly rates charged by Garrey, Woner, Hoffmaster & Peshek are entirely reasonable and competitive, however the rates are confidential and proprietary.
11. Insurance companies generally negotiate for discounted rates and Garrey, Woner, Hoffmaster & Peshek's rates for Travelers due to a pay freeze and delay in processing a fee request are well below the market standard for other clients.
12. The fee that that was negotiated between Garrey, Woner, Hoffmaster & Peshek and PFP's insurance carrier was a fixed hourly rate.
13. I have reviewed the bills and they are accurate as to both time and cost.
14. The total amount of attorneys' fees incurred in defending Plaintiffs' claims was \$20,542.00; the invoices for fees and costs were subject to constant review and

auditing by Travelers Insurance Company and its billing consultants. Any impermissible charges, duplicative work, or unsupported expense would not have been charged and/or would be "written off"; where work was duplicative or supervised, a credit or offset was made to avoid any duplicative or excessive charges.

15. The total amount of taxable costs incurred in defending Plaintiffs' claims was \$265.75.

16. The above statements are true and accurate to the best of my knowledge, information and belief and this Affidavit is made under penalty of perjury pursuant to Arizona Rules of Civil Procedure 80(c).

EXECUTED this 7th day of January, 2021.

  
Stephanie K. Gintert

# Exhibit A

Selection Criteria

Clie.Selection Include: 20000-783  
A/R.Classification Open

'B' for Billed. 'P' for Posted.

ID	Date	Type	Invoice #	Client	Check Number	Total
24195	6/2/2020	INV	G:22967	B 20000-783		2732.80
			Invoice No. 22967			
24347	7/2/2020	INV	G:23003	B 20000-783		1904.00
			Invoice No. 23003			
24402	7/9/2020	PAY	G:23090	B 20000-783		(2727.00)
			Payment - Travelers - \$2,727.00 - invoice no. 22967. Ck 91262950			
24403	7/9/2020	CRED	G:23090	B 20000-783		(5.80)
			Credit per Travelers deductions - invoice no. 22967			
24561	8/4/2020	INV	G:23090	B 20000-783		1938.00
			Invoice No. 23090			
24802	10/13/2020	INV	G:23189	B 20000-783		10641.75
			Invoice No. 23189			
24870	10/20/2020	PAY	G:23281	B 20000-783		(10641.75)
			Payment - Travelers - \$10,641.75 - invoice no. 23189. Ck 91475391			
24952	10/27/2020	PAY	G:23281	B 20000-783		(1829.00)
			Payment - Travelers - \$1,829.00 - invoice no. 23003. Ck 91489842			
24953	10/27/2020	WOFF	G:23281	B 20000-783		(75.00)
			Write off due to deductions - invoice no. 23003			
25013	11/4/2020	INV	G:23281	B 20000-783		1615.00
			Invoice No. 23281			
25075	11/10/2020	PAY	G:23425	B 20000-783		(1938.00)
			Payment - Travelers - \$1,938.00 - invoice no. 23090. Ck 91518059			

1/7/2021  
4:08 PM

Garrey, Woner, Hoffmaster & Peshek, P.C.  
A/R Transaction Listing

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ID	Date	Type Invoice #	Client Check Number	Total
25148	11/16/2020	PAY G:23425	B 20000-783	(1564.00)
Payment - Travelers - \$1,564.00 - invoice no. 23281. Ck 91529108				
25149	11/16/2020	WOFF G:23425	B 20000-783	(51.00)
Write off due to deductions - invoice no. 23281				
25436	1/7/2021	INV G:23425	B 20000-783	2108.00
Invoice No. 23425				
Grand Total				
Invoice				20939.55
Payment				(18699.75)
Credit				(5.80)
Write Off				(126.00)