

Exhibit “A”

Time Report

Billed and Unbilled

CNA Insurance / Jie Cao, Haining Xia, Stone Xia v Dorsey (CNA-DORSEY.01)

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
12/09/2019	EIR	0.20	33.00	165.00	Review and revise Notice of Appearance.
12/09/2019	EIR	0.90	148.50	165.00	Review new pro per complaint filed against individual Board members and other new matter materials and consider defenses to same, including Motion to Dismiss on the ground that one plaintiff cannot represent the other two.
12/09/2019	EIR	0.50	82.50	165.00	Consider applicable statutes regarding condominium termination.
12/09/2019	VXT	0.30	25.50	85.00	Prepare and send email to Matt Quinn regarding meeting to discuss status of new claim, leave voice mail regarding same.
12/09/2019	VXT	0.60	51.00	85.00	Prepare and finalize Notice of Appearance on behalf of Defendants Polger and Quinn.
12/10/2019	EIR	0.20	33.00	165.00	Draft communication to title company to obtain underlying governing documents and condominium termination contract since we have not been able to reach client.
12/10/2019	VXT	0.40	34.00	85.00	Call and email Defendant Matt Quin again and leave another voice mail regarding representation and request for contact.
12/10/2019	VXT	0.20	17.00	85.00	Calculate Answer deadline based on alleged service.
12/13/2019	EIR	0.50	82.50	165.00	Review issues related to inability to contact client, deficiencies in the complaint and whether those deficiencies warrant a Motion to Dismiss especially in light of the specific steps to be taken per Arizona law and the failure of the Plaintiffs to state that they unsuccessfully availed themselves of the statutory process.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
12/13/2019	EIR	0.20	33.00	165.00	Draft communication to claims adjuster in response to client's allegation that he has withdrawn the claim made to carrier.
12/13/2019	NCN	1.60	232.00	145.00	Analysis of complaint and possible motion to dismiss
12/17/2019	EIR	0.20	33.00	165.00	Review communication from claims adjuster regarding communication from insured conditionally withdrawing claim.
12/17/2019	EIR	0.40	66.00	165.00	Draft response to communication from claims adjuster regarding communication from insured conditionally withdrawing claim and status of service of process and issues therewith.
12/19/2019	VXT	0.30	25.50	85.00	Receive and review Application for Default and calculate deadline of 12/30/19.
12/20/2019	EIR	0.40	66.00	165.00	Draft detailed communication to clients regarding Application and Affidavit for Default and time frames within which they are required to respond.
01/02/2020	VXT	0.40	34.00	85.00	Draft Motion to Withdraw as Counsel and proposed Order.
01/03/2020	VXT	0.60	51.00	85.00	Finalize Motion to Withdraw As Counsel Without Consent and proposed Order; file with Court and distribute to counsel.
01/07/2020	VXT	0.30	25.50	85.00	Analyze Order from Court regarding Motion for Default against Defendant Polger.
01/07/2020	VXT	0.50	42.50	85.00	Analyze first Application for Default Judgment, new Motion for Entry of Default Judgment and proposed Order.
02/03/2020	VXT	0.00	0.00	0.00	Obtain Order Granting Motion to Withdraw and close file.
04/27/2020	EIR	2.90	478.50	165.00	Review new Amended Complaint and perform initial research into the parties, the property at issue and related matters in the Amended Complaint.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
04/27/2020	EIR	0.20	33.00	165.00	Draft communication to General Counsel for client regarding initial interview on issues set forth in Amended Complaint, including issues related to service of process.
04/27/2020	NCN	3.20	464.00	145.00	Analysis of plaintiffs' 1st amended complaint
04/28/2020	EIR	0.50	82.50	165.00	Telephone conference with Jennifer Barry, General Counsel for client, to discuss history of case, factual basis, evidence of termination, procedure therefor, and related issues, including dual representation of both defendants.
04/28/2020	NCN	3.40	493.00	145.00	Analysis of plaintiffs' first amended complaint and best options for responsive pleading
04/28/2020	NCN	3.60	522.00	145.00	Analysis of file from client's former counsel
04/29/2020	NCN	0.60	87.00	145.00	Draft statutory memo required by ARS 33-1260
04/29/2020	NCN	0.80	116.00	145.00	Draft correspondence to client regarding terms of representation and initial strategy
04/29/2020	NCN	0.80	116.00	145.00	Draft litigation hold letter to plaintiffs
04/29/2020	NCN	0.80	116.00	145.00	Draft litigation hold letter to the association
04/30/2020	NCN	4.40	638.00	145.00	Analysis of additional documents from prior counsel's file
04/30/2020	EIR	1.10	181.50	165.00	Review issues related to the current state of the litigation, service of process upon Michael Schern and how best to effect that occurrence, analysis of the possibility of an Motion to Dismiss and approaching Plaintiffs' counsel regarding settlement and related issues that affect how we proceed with the defense.
04/30/2020	EIR	0.20	33.00	165.00	Review and respond to communications from carrier regarding strategy discussion and related issues.
05/01/2020	EIR	0.20	33.00	165.00	Prepare outline for conference call with carrier regarding issues to discuss and requests for authority and her expectations for the defense, as well as confirmation of client.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
05/01/2020	EIR	0.40	66.00	165.00	Conference call with Laura McCaffrey, claims adjuster, regarding issues to discuss and requests for authority and her expectations for the defense, as well as confirmation of client.
05/07/2020	EIR	0.50	82.50	165.00	Consider outstanding issues including service of process and related potential problems related thereto and deciding whether a Motion to Dismiss is the best avenue or whether a preemptive letter to counsel was the better strategy.
05/07/2020	EIR	0.20	33.00	165.00	Review correspondence from client's General Counsel related to pending Complaint and authorization to accept service and coordinating defense with counsel for PFP Dorsey Investments.
05/07/2020	EIR	0.20	33.00	165.00	Review correspondence from client's prior counsel related to pending Complaint and authorization to accept service and coordinating defense with counsel for PFP Dorsey Investments.
05/07/2020	NCN	0.80	116.00	145.00	Multiple email communications with client regarding accepting service on behalf of the Association and clarifying scope of representation
05/07/2020	NCN	0.80	116.00	145.00	Multiple email communications with Association's general counsel regarding status of case
05/07/2020	NCN	0.80	116.00	145.00	Draft correspondence to client regarding the scope of our representation and other initial case management considerations
05/07/2020	NCN	0.80	116.00	145.00	Draft litigation hold letter to opposing counsel
05/07/2020	NCN	0.80	116.00	145.00	Draft litigation hold letter to client
05/08/2020	EIR	0.80	132.00	165.00	Telephone conference with Michael Schern, General Counsel for Association during termination period, to discuss his recollections of what happened, Plaintiff's transaction in particular, and the history of the case during the time he represented the individual clients.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
05/08/2020	EIR	0.40	66.00	165.00	Review pending matter to prepare for conference call with Michael Schern. the Association's General Counsel during the termination process.
05/08/2020	NCN	1.10	159.50	145.00	Analysis of A.R.S. 33-420 letter from opposing counsel
05/08/2020	NCN	2.30	333.50	145.00	Begin drafting litigation plan for carrier
05/09/2020	EIR	0.20	33.00	165.00	Review and revise to communication from Jennifer Barry, General Counsel for client, regarding pending conference call and the agenda for same.
05/09/2020	EIR	0.20	33.00	165.00	Review and revise draft Litigation Hold Letter to client.
05/09/2020	EIR	0.20	33.00	165.00	Review and revise draft Litigation Hold Letter to opposing counsel for Plaintiffs.
05/09/2020	EIR	0.20	33.00	165.00	Review and revise draft Letter of Representation to client.
05/11/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for client, regarding presenting united front at this stage of the litigation and discussions we should have with counsel for PFP Dorsey Investments regarding same.
05/11/2020	EIR	0.20	33.00	165.00	Draft response to communication from Jennifer Barry, General Counsel for client, regarding presenting united front at this stage of the litigation and discussions we should have with counsel for PFP Dorsey Investments regarding same.
05/12/2020	EIR	0.90	148.50	165.00	Conference call with client's General Counsel and co-defense counsel Shawna Woner and Stephanie Kwan along with prior counsel, Michael Schern, and Bill Brennan, the client's agent, to discuss pending matter, process moving forward, taking point on case and related issues.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
05/12/2020	EIR	0.50	82.50	165.00	Review pending matter and research persons intended to be on conference call with client and co-defense counsel as well as setting forth the position we intend to take vis-a-vis defending the Association.
05/12/2020	NCN	2.20	319.00	145.00	Begin drafting responsive pleading
05/14/2020	EIR	0.20	33.00	165.00	Conference call with Laura McCaffrey of CNA regarding entrance into the case by Traveler's Insurance Company and how the relationship between the carriers will work.
05/14/2020	EIR	0.20	33.00	165.00	Telephone conference with Sarah Kennedy of Traveler's Insurance Company regarding entrance into the case by Traveler's and how the relationship between the carriers will work.
05/14/2020	EIR	0.20	33.00	165.00	Review communication from carrier regarding co-carrier entering case.
05/18/2020	EIR	0.40	66.00	165.00	Review and revise proposed letter to Plaintiffs' counsel after he failed to return phone calls.
05/18/2020	NCN	1.60	232.00	145.00	Draft correspondence to opposing counsel regarding acceptance of service and issues with amended complaint
05/18/2020	NCN	3.70	536.50	145.00	Analysis of amended complaint and the impact of the amendment to ARS 33-1228 on the claims along with the practical impossibility of the relief being sought
05/19/2020	EIR	0.30	49.50	165.00	Consider all of the issues raised by Plaintiffs' counsel's failure to respond, service of process issues and related concerns on moving this case forward.
05/19/2020	CHR	0.20	17.00	85.00	Prepare final draft of Letter to opposing counsel regarding representation and acceptance of service.
05/19/2020	CHR	0.20	17.00	85.00	Prepare email correspondence to opposing counsel transmitting Letter (with attachments) regarding representation and acceptance of service.
05/19/2020	CHR	0.20	17.00	85.00	Prepare final draft of Litigation Hold Letter to Opposing counsel.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
05/19/2020	CHR	0.20	17.00	85.00	Prepare email correspondence to opposing counsel transmitting Litigation Hold Letter.
05/19/2020	CHR	0.20	17.00	85.00	Prepare final draft of Litigation Hold Letter to Carrier.
05/19/2020	CHR	0.20	17.00	85.00	Prepare final draft of Letter of Representation to Carrier.
05/20/2020	EIR	0.30	49.50	165.00	Review multiple communications from General Counsel Jennifer Barry regarding response from Plaintiffs' counsel and acceptance of service issues.
05/20/2020	EIR	0.30	49.50	165.00	Review multiple communications from co-defense counsel Shawna Worner regarding response from Plaintiffs' counsel and acceptance of service issues.
05/26/2020	EIR	0.20	33.00	165.00	Review issues related to pending matter and accepting Travelers conditions of employment.
05/28/2020	EIR	0.40	66.00	165.00	Consider issues raised by opposing counsel to our communication calling into question the basis for Plaintiffs' claims and how we proceed in light of Plaintiffs' counsel's statement that Plaintiffs' want to "make law".
05/28/2020	EIR	0.20	33.00	165.00	Review communications from client and co-defense counsel on their dealings with opposing counsel and the posture of the pending action.
05/28/2020	NCN	0.80	116.00	145.00	Multiple email communications with client regarding discussions with opposing counsel and possible settlement options
05/28/2020	NCN	0.80	116.00	145.00	Teleconference with opposing counsel regarding service of documents and issues with allegations in amended complaint
05/28/2020	NCN	1.80	261.00	145.00	Analysis of opposing counsel's arguments regarding the impact of the statute's amendment
05/28/2020	NCN	0.90	130.50	145.00	Analysis of options to address potential late filing of amended complaint as ordered by judge

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
06/02/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry regarding prior settlement negotiations between PFP Dorsey and Plaintiffs.
06/02/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner regarding status of her negotiations with Plaintiffs' counsel.
06/02/2020	NCN	3.10	449.50	145.00	Analysis of documents from client regarding pre litigation negotiations with plaintiffs
06/03/2020	EIR	0.20	33.00	165.00	Telephone conference with Cheryl Kennedy on current status, Plaintiffs' failure to provide waiver of service documents, claims and remedies demanded, brief synopsis of prior settlement negotiations.
06/11/2020	EIR	0.20	33.00	165.00	Review communication from Ross Meyer at Wilenchik Bartness regarding amending the First Amended Complaint to address issues Defendants have with same.
06/11/2020	EIR	0.20	33.00	165.00	Review follow-up communication from Jack Wilenchik at Wilenchik Bartness regarding amending the First Amended Complaint to address issues Defendants have with same as well as how Plaintiffs intend to address service of process upon Defendants.
06/11/2020	NCN	0.80	116.00	145.00	Multiple email communications with opposing counsel regarding amending their complaint in lieu of signing prior acceptance of service documents
06/12/2020	EIR	0.30	49.50	165.00	Telephone conference with Shawna Worner, attorney for PFP Dorsey, regarding her discussions with Plaintiffs' counsel on settlement and related issues.
06/12/2020	EIR	0.40	66.00	165.00	Review proposed Second Amended Complaint Plaintiffs want to file with the Court, seeking our stipulation thereto.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
06/12/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner, counsel for co-Defendant PFP Dorsey on her most recent communications with opposing counsel Jack Wilenchik.
06/12/2020	EIR	0.80	132.00	165.00	Review communications attached to Jennifer Barry's email with all Loren Polger's communications with Haining Xia trying to negotiate a settlement.
06/12/2020	NCN	1.10	159.50	145.00	Analysis of correspondence from opposing counsel regarding amending complaint to include 33-420 claim
06/12/2020	NCN	2.10	304.50	145.00	Analysis of proposed second amended complaint from opposing counsel
06/15/2020	EIR	0.60	99.00	165.00	Consider issues raised by Plaintiffs' proposed Second Amended Complaint and the settlement posture the Association should take in light of Plaintiffs' failure to make a monetary demand at this point.
06/16/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner, counsel for PFP Dorsey, to the client regarding her discussions with her carrier on settlement and related issues on the Second Amended Complaint.
06/16/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner regarding her discussions with Plaintiffs' counsel regarding the amended complaint and potential for settlement and related issues.
06/16/2020	EIR	0.30	49.50	165.00	Review and respond to communication from Laura McCaffrey regarding proposed Second Amended Complaint and potential settlement of claims.
06/16/2020	NCN	0.30	43.50	145.00	Analysis of correspondence from PFP counsel regarding plaintiffs' proposed motion to amend and approach to settlement

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
06/17/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, client's General Counsel, regarding proposed settlement posture and the Plaintiffs' Second Amended Complaint and ancillary issues related to earlier in the litigation.
06/17/2020	EIR	0.20	33.00	165.00	Review and revise proposed communication to opposing counsel for Plaintiff regarding stipulating to filing their Second Amended Complaint while reserving all rights and defenses thereto.
06/17/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner, co-defense counsel for PFP Dorsey, with her requested changes to Plaintiffs' Second Amended Complaint and stipulation to filing same.
06/17/2020	EIR	0.20	33.00	165.00	Review communication from Jack Wilenchik, Plaintiff's counsel, in response to Shawna Woner's requested changes to their Second Amended Complaint and housekeeping from earlier in the litigation.
06/17/2020	EIR	0.20	33.00	165.00	Review Shawna Woner's response to Jack Wilenchik's retort to her communication on pending issues with the Second Amended Complaint.
06/17/2020	EIR	0.70	115.50	165.00	Consider issues related to making the first settlement offer as opposed to requesting a demand from Plaintiffs and the pitfalls to that process as well as an analysis of what damages Plaintiffs may be seeking in the absence of a demand.
06/17/2020	NCN	1.90	275.50	145.00	Draft litigation plan and case analysis for carrier
06/17/2020	NCN	0.80	116.00	145.00	Multiple email communications with plaintiffs' and PFP's counsel regarding filing of second amended complaint and new claim for ARS 33-420

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
06/18/2020	EIR	0.50	82.50	165.00	Telephone conference with Laura McCaffrey and Cheryl Kennedy regarding posture of the case, extrapolations from recent communications with co-defense counsel and Plaintiff's counsel, settlement posture and proceeding with settlement.
06/18/2020	EIR	0.40	66.00	165.00	Consider potential pitfalls to seeking a demand, what that demand might look like and how Plaintiffs might calculate same and related issues prior to drafting communication to client regarding same.
06/18/2020	EIR	0.40	66.00	165.00	Draft communication to client regarding posture of the case, extrapolations from recent communications with co-defense counsel and Plaintiff's counsel, settlement posture and proceeding with settlement.
06/18/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner, counsel for PFP Dorsey, objecting to our proposal to seek a demand from Plaintiffs before making a settlement offer or going to mediation.
06/18/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for client, in response to the communication from Shawna Woner, counsel for PFP Dorsey, objecting to our proposal to seek a demand from Plaintiffs before making a settlement offer or going to mediation.
06/18/2020	NCN	1.40	203.00	145.00	Draft litigation plan and case analysis for carrier (continued)
06/19/2020	EIR	0.40	66.00	165.00	Telephone conference with co-defense counsel Shawna Woner regarding united front from Defendants when addressing settlement with Plaintiffs' counsel.
06/19/2020	EIR	0.20	33.00	165.00	Review communication from client with Reservation of Rights letters from each carrier.
06/19/2020	EIR	0.20	33.00	165.00	Review Reservation of Rights letters from each carrier.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
06/22/2020	EIR	0.30	49.50	165.00	Review and revise proposed letter to opposing counsel requesting demand from Plaintiffs as opening for settlement negotiations.
06/22/2020	EIR	0.20	33.00	165.00	Review communication from opposing counsel for Plaintiffs with previous waivers of service sent to prior counsel Michael Schern.
06/22/2020	EIR	0.20	33.00	165.00	Review proposed waiver of service Plaintiffs' counsel requests that we execute setting deadline to respond to First Amended Complaint in light of the fact that Plaintiffs are getting ready to file a Second Amended Complaint.
06/22/2020	NCN	1.20	174.00	145.00	Draft Rule 408 correspondence to opposing counsel regarding need for a demand from their side before further engaging in settlement discussions
06/22/2020	NCN	0.60	87.00	145.00	Multiple email communications with opposing counsel regarding service of amended complaint on prior counsel
06/23/2020	CHR	0.20	17.00	85.00	Prepare final draft of Rule 408 Letter to opposing counsel.
06/23/2020	CHR	0.20	17.00	85.00	Prepare email correspondence to opposing counsel transmitting Rule 408 Letter to opposing counsel.
06/23/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner, counsel for co-Defendant PFP Dorsey, regarding proposed communication to opposing counsel requesting a demand to open settlement negotiations.
06/23/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for client, regarding proposed communication to opposing counsel requesting a demand to open settlement negotiations.
06/25/2020	EIR	0.30	49.50	165.00	Review issues raised in conference call with counsel for Plaintiff regarding service of process, their Second Amended Complaint, and our request for a formal demand.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
06/25/2020	NCN	2.70	391.50	145.00	Draft litigation plan and case analysis for carrier (continued)
07/01/2020	EIR	0.20	33.00	165.00	Review and consider communication from Cheryl Kennedy from Travelers regarding pending correspondence requesting demand from Plaintiffs and posture of pending Second Amended Complaint.
07/01/2020	EIR	0.30	49.50	165.00	Draft response to communication from Cheryl Kennedy from Travelers regarding pending correspondence requesting demand from Plaintiffs and posture of pending Second Amended Complaint.
07/06/2020	EIR	0.20	33.00	165.00	Call to opposing counsel Ross Meyer on status of pending request for demand and whether and when they are going to file the Second Amended Complaint.
07/06/2020	EIR	1.10	181.50	165.00	Begin drafting the Litigation Plan including analyzing causes of action and legal under-pinning and related issues.
07/08/2020	EIR	0.50	82.50	165.00	Draft communication to claims adjusters bringing them up to speed on the pending matter and most current court filings and possible next step in process.
07/08/2020	EIR	1.80	297.00	165.00	Continue drafting the Litigation Plan including analyzing causes of action and legal under-pinning and related issues.
07/09/2020	EIR	0.30	49.50	165.00	Draft communication to client regarding pending matter, discussion with opposing counsel, Second Amended Complaint as actually filed, potential for damages and related issues.
07/09/2020	EIR	0.20	33.00	165.00	Draft communication to claims adjusters in response to communication received from client requesting settlement authority in light of fact that demand not yet received from opposing counsel for Plaintiffs.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
07/09/2020	EIR	0.20	33.00	165.00	Review communication from client's General Counsel regarding pending matter, discussions with opposing counsel regarding settlement offer, and related issues.
07/09/2020	NCN	1.80	261.00	145.00	Analysis of best responsive pleading to second amended complaint and determining motion to dismiss is most appropriate
07/10/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner, Pathfinder's defense counsel, regarding her communications with opposing counsel for Plaintiff on their Second Amended Complaint and possibility of a demand.
07/10/2020	EIR	0.20	33.00	165.00	Review communication from client's General Counsel in response to the communication from Shawna Woner, Pathfinder's defense counsel, regarding her communications with opposing counsel for Plaintiff on their Second Amended Complaint and possibility of a demand.
07/10/2020	EIR	0.20	33.00	165.00	Review communication from claims adjuster regarding Second Amended Complaint, issues related to settlement demand and expectations thereof.
07/10/2020	EIR	0.30	49.50	165.00	Draft response to further inquiry from client's General Counsel regarding pushing forward with settlement demand and negotiations.
07/13/2020	EIR	0.40	66.00	165.00	Consider issues raised by review of applicable statutes and potential for exorbitant damages to be claimed by Plaintiffs, especially in light of counsel's failure to further prosecute this case.
07/17/2020	NCN	0.30	43.50	145.00	Analysis of acceptance of service documents from opposing counsel
07/20/2020	EIR	2.20	363.00	165.00	Continued drafting Litigation Plan with analysis of claims and parties.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
07/20/2020	EIR	0.20	33.00	165.00	Review proposed Stipulation to Dismiss without prejudice between counsel for Plaintiff and counsel for the individual defendants previously listed in the complaint when plaintiffs were representing themselves.
07/20/2020	EIR	0.40	66.00	165.00	Study the issues related to whether the case is ripe for an Motion to Dismiss and why based upon the remedies available to Plaintiffs within the statute.
07/20/2020	NCN	0.80	116.00	145.00	Multiple email communications with opposing counsel regarding acceptance of service documents and amended complaint
07/20/2020	NCN	0.20	29.00	145.00	Analysis of stipulation to dismiss certain defendants
07/21/2020	NCN	0.90	130.50	145.00	Finalize litigation plan
07/22/2020	NCN	1.40	203.00	145.00	Complete revisions to draft litigation plan and case analysis
07/22/2020	NCN	3.10	449.50	145.00	Begin drafting responsive pleading to 2nd amended complaint
07/23/2020	NCN	1.40	203.00	145.00	Draft motion to dismiss (continued)
07/23/2020	NCN	2.60	377.00	145.00	Analysis of allegations in second amended complaint regarding sale of entire development and impact of meeting compliance on validity of condo termination
07/24/2020	NCN	2.80	406.00	145.00	Draft motion to dismiss section on failure to plead claim of unconstitutionality
07/27/2020	CHR	0.20	17.00	85.00	Review Order Dismissing Certain Defendants W/O Prejudice (Lorne Polger, Matt Quinn, and Michael A. Schern).
07/27/2020	EIR	0.20	33.00	165.00	Review Order entered by Court dismissing the individual defendants without prejudice.
07/27/2020	EIR	0.20	33.00	165.00	Review and respond to communications to carriers regarding pending matters and possibility of settlement.
07/27/2020	NCN	0.20	29.00	145.00	Analysis of order dismissing individual defendants without prejudice

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07/27/2020	NCN	0.60	87.00	145.00	Teleconference with PFP Dorsey counsel regarding planned response to 2nd amended complaint and settlement considerations
07/28/2020	EIR	0.70	115.50	165.00	Telephone conference with claims adjusters for both carriers regarding settlement negotiations, how the initial offer should be structured, mediation with Judge Aceto, position on prior settlement negotiations and related issues.
07/28/2020	EIR	0.30	49.50	165.00	Telephone conference with Jennifer Barry, General Counsel for Pathfinder, regarding the conversation with the adjusters, their desire to settle, and related issues.
07/28/2020	EIR	0.20	33.00	165.00	Follow-up conversation with Jennifer Barry to clarify prior settlement negotiations with Plaintiffs.
07/28/2020	EIR	0.40	66.00	165.00	Consider additional issues related to proposed settlement posture, composition of the settlement offer, possible responses thereto, the Motion to Dismiss and its effectiveness as leverage, and related issues.
07/28/2020	EIR	0.30	49.50	165.00	Draft communications to claims adjusters for the carriers regarding discussions with Jennifer Barry, General Counsel for Pathfinder and her opinions to the settlement process going forward.
07/28/2020	NCN	1.30	188.50	145.00	Draft motion to dismiss (continued)
07/29/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, regarding how Pathfinder intends to participate in settlement discussions.
07/29/2020	EIR	0.20	33.00	165.00	Draft communication to Shawna Woner, counsel for PFP Dorsey Investments LLC, regarding discussions with carriers and efforts to formulate an opening offer to Plaintiffs to settle case.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
07/29/2020	EIR	0.20	33.00	165.00	Call with Shawna Woner, counsel for PFP Dorsey Investments LLC, regarding settlement opportunity and terms authorized by the client.
07/29/2020	EIR	0.20	33.00	165.00	Draft communication to Jennifer Barry, General Counsel for Pathfinder, that we have spoken to Shawna Woner, counsel for PFP Dorsey Investments LLC, who is getting authority from her adjuster.
07/29/2020	EIR	0.40	66.00	165.00	Analyze issues raised by ARS §33-1228(E) and whether a sale to PFP Dorsey Investments LLC constitutes a sale to a third party sufficient not to trigger the tenants-in-common feature of this subsection of the termination statute and was determined that yes, PFP Dorsey Investments LLC is a third party and the subsection is not implicated in the termination.
07/29/2020	EIR	0.20	33.00	165.00	Review response from Shawna Woner, counsel for PFP Dorsey Investments LLC, regarding discussions with carriers and efforts to formulate an opening offer to Plaintiffs to settle case and what she believes her carrier's response will be to same.
07/29/2020	CPM	0.40	66.00	165.00	Outline defense arguments and timing of same.
07/29/2020	NCN	1.20	174.00	145.00	Draft MTD section addressing 33-1228(E)'s application to this matter
07/29/2020	NCN	0.70	101.50	145.00	Begin drafting Rule 408 correspondence to opposing counsel
07/30/2020	EIR	0.60	99.00	165.00	Draft detailed communication to carriers in response to detailed communications from the CNA carrier.
07/30/2020	EIR	0.30	49.50	165.00	Review the public records for information and documentation to use to respond to the inquiries from the CNA adjuster.
07/30/2020	EIR	0.30	49.50	165.00	Telephone conference with Laura McCaffrey regarding the client having skin in the game and what PFP Dorsey Investments LLC counsel is suggesting for settlement terms.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
07/30/2020	EIR	0.30	49.50	165.00	Telephone conference with Shawna Woner regarding issues related to her settlement proposal for global resolution of the case.
07/30/2020	EIR	0.30	49.50	165.00	Draft detailed communication to Shawa Woner, counsel for PFP Dorsey Investments LLC, regarding her proposed settlement structure and communicating same to Plaintiffs' counsel.
07/30/2020	EIR	0.30	49.50	165.00	Review detailed stream of consciousness communication from Shawna Woner, counsel for PFP Dorsey Investments LLC, on the structure of the proposed settlement and why the joint initial settlement offer should be less than suggested.
07/30/2020	EIR	0.20	33.00	165.00	Draft communication to Cheryl Kennedy in response to her authorization to Settlement and the inquiry therein.
07/30/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, regarding her opinion on the settlement proposal.
07/30/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner to Jack Wilenchik regarding settlement.
07/30/2020	EIR	0.20	33.00	165.00	Review communication from Jack Wilenchik in response to Shawna Woner's communication regarding settlement.
07/31/2020	EIR	0.20	33.00	165.00	Review communication from co-defense counsel Shawna Woner for PFP Dorsey Investments LLC confirming terms of settlement offer to Plaintiffs.
07/31/2020	EIR	0.30	49.50	165.00	Telephone conference with co-defense counsel Shawna Woner for PFP Dorsey Investments LLC and Jack Wilenchik, attorney for Plaintiffs, regarding Plaintiffs' goals in this litigation and our opening offer.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
07/31/2020	EIR	0.40	66.00	165.00	Consider issues raised by Jack Wilenchik in conference call regarding settlement on Plaintiffs' request to file a "stipulated Motion for Summary Judgment" to get the issue of the enforceability of A.R.S. §33-1228 against them and the logistics of same.
07/31/2020	EIR	0.20	33.00	165.00	Review follow-up communication from Shawna Woner for PFP Dorsey Investments LLC to memorialize the Defendants joint offer of settlement.
07/31/2020	NCN	1.10	159.50	145.00	Draft motion to dismiss (continued)
08/03/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner, counsel for PFP Dorsey Investments LLC regarding deadline to respond to complaint, given the pending settlement offer.
08/03/2020	EIR	0.20	33.00	165.00	Review communication from Jack Wilenchik, counsel for Plaintiffs, rejecting settlement offer.
08/03/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner, co-defense counsel for PFP Dorsey Investments LLC, in response to the communication from Jack Wilenchik, counsel for Plaintiffs, rejecting settlement offer.
08/03/2020	EIR	0.40	66.00	165.00	Consider issues raised by communication from Jack Wilenchik, counsel for Plaintiffs, rejecting settlement offer.
08/03/2020	EIR	0.40	66.00	165.00	Draft communication to Shawna Woner, co-defense counsel for PFP Dorsey Investments LLC, in response to her communication regarding the communication received from Jack Wilenchik, counsel for Plaintiffs, rejecting settlement offer.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
08/03/2020	EIR	0.40	66.00	165.00	Draft communication to carriers regarding communications received from Shawna Woner, co-defense counsel for PFP Dorsey Investments LLC, Jack Wilenchik, counsel for Plaintiffs, that Plaintiffs have rejected settlement offer and recommendations or next steps.
08/03/2020	NCN	2.30	333.50	145.00	Complete draft of motion to dismiss
08/03/2020	NCN	1.20	174.00	145.00	Analysis of correspondence from opposing counsel regarding his clients rejecting our settlement offer and proposing a joint MSJ effort
08/03/2020	NCN	0.80	116.00	145.00	Multiple email communications with co-defense counsel regarding extensions and responsive pleading options
08/04/2020	NCN	0.40	58.00	145.00	Teleconference with co-defense counsel regarding coordinating our motions to dismiss in this matter
08/05/2020	EIR	0.20	33.00	165.00	Review communication from Stephanie Gintert, counsel for PFP Dorsey Investments LLC, with her concerns about the proposed Motion to Dismiss.
08/05/2020	NCN	0.70	101.50	145.00	Analysis of correspondence from PFP counsel regarding motion to dismiss argument on 33-1228(G)(1) grounds
08/05/2020	NCN	0.60	87.00	145.00	Analysis of correspondence from co-defense counsel regarding argument that claim must be arbitrated pursuant to ARS 33-1228
08/07/2020	NCN	0.40	58.00	145.00	Analysis of correspondence from client regarding communications from plaintiffs to defendant
08/10/2020	EIR	0.20	33.00	165.00	Review communication from carrier regarding issues with Motion to Dismiss and efforts to settle as well as broaching subject of early mediation to Plaintiffs.
08/10/2020	EIR	0.50	82.50	165.00	Draft response to communication from carrier regarding issues with Motion to Dismiss and efforts to settle as well as broaching subject of early mediation to Plaintiffs.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
08/10/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, forwarding inquiry from Plaintiff Jie Cao for notary public information from Pathfinder employee who notarized the signatures on the Termination Agreement, the Warranty Deed and the Affidavit of Value for Unit 106.
08/10/2020	EIR	0.20	33.00	165.00	Review inquiry from Plaintiff Jie Cao for notary public information from Pathfinder employee who notarized the signatures on the Termination Agreement, the Warranty Deed and the Affidavit of Value for Unit 106.
08/10/2020	EIR	0.20	33.00	165.00	Review follow-up communication from Jennifer Barry, General Counsel for Pathfinder, forwarding inquiry from Plaintiff Jie Cao for notary public information from Pathfinder employee who notarized the signatures on the Termination Agreement, the Warranty Deed and the Affidavit of Value for Unit 106.
08/10/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, with questions regarding deadlines for responding to Plaintiffs' complaint, whether settlement negotiations are dead since Plaintiffs did not provide a counteroffer, whether an Offer of Judgment is appropriate to set the floor and further similar questions.
08/10/2020	EIR	0.20	33.00	165.00	Review follow-up communication from Shawna Woner, counsel for co-defendant PFP Dorsey Investments LLC, written in response to communication from Jennifer Barry, General Counsel for Pathfinder, forwarding inquiry from Plaintiff Jie Cao for notary public information from Pathfinder employee who notarized the signatures on the Termination Agreement, the Warranty Deed and the Affidavit of Value for Unit 106.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
08/10/2020	EIR	0.60	99.00	165.00	Draft detailed communication to Jennifer Barry, General Counsel for Pathfinder, regarding inquiry from Plaintiff Jie Cao for notary public information from Pathfinder employee who notarized the signatures on the Termination Agreement, the Warranty Deed and the Affidavit of Value for Unit 106 as well as her questions regarding the proposed Motion to Dismiss, settlement chances in light of Plaintiffs' failure to make counteroffer and opportunities for mediation, among other questions from her.
08/10/2020	EIR	0.20	33.00	165.00	Review response from Shawna Woner, counsel for co-defendant PFP Dorsey Investments LLC, to communication from Jennifer Barry, General Counsel for Pathfinder, forwarding inquiry from Plaintiff Jie Cao for notary public information from Pathfinder employee who notarized the signatures on the Termination Agreement, the Warranty Deed and the Affidavit of Value for Unit 106.
08/10/2020	NCN	0.30	43.50	145.00	Teleconference with PFP Dorsey counsel regarding Motion to Dismiss arguments
08/10/2020	NCN	0.90	130.50	145.00	Draft revisions to motion to dismiss based on input from PFP Dorsey counsel
08/11/2020	EIR	1.10	181.50	165.00	Review and Review and Review and edit proposed Motion to Dismiss or Motion for More Definite Statement in the Alternative to revise the structure of the Motion and sequence of the arguments and better position the arguments in support of dismissal.
08/11/2020	EIR	0.20	33.00	165.00	Review communication from General Counsel for Pathfinder with her concerns about Plaintiffs' notary inquiry and related issues.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
08/11/2020	EIR	0.30	49.50	165.00	Draft response to communication from General Counsel for Pathfinder with her concerns about Plaintiffs' notary inquiry and related issues.
08/11/2020	NCN	0.50	72.50	145.00	Participate in meet and confer meeting as required by rules of civil procedure for commercial cases
08/12/2020	EIR	0.50	82.50	165.00	Review proposed Motion to Dismiss prepared by co-defense counsel Shawna Woner on behalf of her client, PFP Dorsey Investments LLC (10 pages) to see if we need to incorporate any of her arguments into the Motion to Dismiss we prepared for the Association.
08/12/2020	EIR	0.60	99.00	165.00	Consider additional issues raised by client regarding the arbitration section in A.R.S. §33-1228 and whether discussion will convert the Motion to Dismiss to an Motion for Summary Judgment which we want to avoid.
08/12/2020	EIR	0.20	33.00	165.00	Review communication from Stephanie Gintert, associate with Shawna Woner, regarding the PFP Dorsey Investments LLC proposed Motion to Dismiss and her intentions to join the Association's Motion to Dismiss to incorporate the arguments on the more definite statement.
08/12/2020	EIR	0.20	33.00	165.00	Review communication from General Counsel for Pathfinder with her comments and suggestions after her review of the proposed Motion to Dismiss with further information on Plaintiffs' parallel lawsuit against the City of Tempe.
08/12/2020	EIR	0.30	49.50	165.00	Draft response to communication from General Counsel for Pathfinder with her comments and suggestions after her review of the proposed Motion to Dismiss with further information on Plaintiffs' parallel lawsuit against the City of Tempe.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
08/12/2020	EIR	0.20	33.00	165.00	Review Stephanie Gintert's response to the communication from General Counsel for Pathfinder with her comments and suggestions after her review of the proposed Motion to Dismiss with further information on Plaintiffs' parallel lawsuit against the City of Tempe.
08/12/2020	EIR	0.20	33.00	165.00	Review follow-up communication from General Counsel for Pathfinder with additional comments and suggestions after Lorne Polger's review of the proposed Motion to Dismiss and his comments.
08/12/2020	EIR	0.20	33.00	165.00	Review communication from Stephanie Gintert to Plaintiffs' counsel regarding the required "meet and confer" pursuant to the Rules of Court.
08/12/2020	NCN	2.10	304.50	145.00	Analysis of PFP Dorsey's MTD
08/12/2020	NCN	1.30	188.50	145.00	Draft revisions to MTD to incorporate client revisions and address statutory remedy issues
08/13/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner to client discussing the issues surrounding the notary public issue and the client's demand that sanctions be sought against Plaintiffs for making that contact.
08/13/2020	EIR	0.30	49.50	165.00	Review PFP Dorsey Investments LLC's revised Motion to Dismiss to determine if it changed any of its arguments and whether we can use their arguments to defend the Association, too.
08/13/2020	EIR	0.20	33.00	165.00	Review the response from the General Counsel for Pathfinder to Shawna Woner's communication regarding the notary public situation and that the General Counsel will take the advice not to make a bigger deal of the situation.
08/13/2020	EIR	0.20	33.00	165.00	Review follow-up communication from Stephanie Gintert, attorney for PFP Dorsey Investments LLC, with additional information regarding discussion with Plaintiffs' counsel regarding notary public inquiry.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
08/13/2020	EIR	0.20	33.00	165.00	Review communication from Stephanie Gintert, counsel for PFP Dorsey Investments LLC, to Plaintiffs' counsel regarding its own Motion to Dismiss and the need for meet and confer
08/13/2020	NCN	1.80	261.00	145.00	Finalize MTD and Good Faith Consultation Certificate teleconference with opposing counsel and PFP dorsey counsel regarding good faith consultation topics
08/13/2020	NCN	0.60	87.00	145.00	Analysis of correspondence from client regarding ongoing issue with plaintiff contacting client's employee
08/13/2020	VJG	0.40	34.00	85.00	Finalize the Motion to Dismiss or Motion for More Definite Statement with supporting documents.
08/13/2020	VJG	0.20	17.00	85.00	Finalize Defendant Dorsey Place Condominium's Good Faith Consultation Certificate.
08/14/2020	NCN	0.20	29.00	145.00	Status update to carriers
08/14/2020	NCN	0.40	58.00	145.00	Analysis of PFP Dorsey's finalized MTD
08/14/2020	NCN	1.10	159.50	145.00	Draft correspondence to client regarding motion to dismiss filings and information obtained during good faith consultation with opposing counsel
08/24/2020	EIR	0.20	33.00	165.00	Review communication from Ross Meyer, attorney for Plaintiffs, regarding responses to Defendants' respective Motions to Dismiss and his issues therewith and deadlines.
08/24/2020	NCN	0.80	116.00	145.00	Multiple communications with opposing counsel regarding extension request for plaintiffs' response to motions to dismiss
08/25/2020	EIR	0.20	33.00	165.00	Review communication from Shawna Woner requesting client's input for authority to grant an extension to Plaintiffs within which to respond to the Defendants' respective Motions to Dismiss.
08/26/2020	EIR	0.30	49.50	165.00	Draft communication to client with recommendations regarding Plaintiffs' response to the Defendants' respective Motions to Dismiss.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
08/26/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, with her instructions and expectations regarding Plaintiffs' responses to the Defendants' Motions to Dismiss.
08/28/2020	NCN	0.60	87.00	145.00	Multiple email communications with opposing counsel regarding extension for response to motions to dismiss
09/01/2020	NCN	0.20	29.00	145.00	Analysis of draft notice of extension of time for Plaintiffs' Response to pending MTDs
09/01/2020	NCN	0.80	116.00	145.00	Multiple email communications with opposing counsel regarding number of days for extension for response to MTD and form of proposed notice regarding the same
09/02/2020	EIR	0.20	33.00	165.00	Review communication from Plaintiffs' counsel regarding terms negotiated for the extension for him to respond to the pending Motions to Dismiss.
09/02/2020	EIR	0.20	33.00	165.00	Review response by Stephanie Gintert in response to communication from Plaintiffs' counsel regarding terms negotiated for the extension for him to respond to the pending Motions to Dismiss.
09/02/2020	NCN	0.60	87.00	145.00	Multiple email communications with opposing counsels regarding length of time for extension to file response to MTD
09/14/2020	EIR	0.20	33.00	165.00	Quick communication to the carriers with update on status of the Motion to Dismiss.
09/16/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, with questions regarding Plaintiffs' response to the Defendants' Motions to Dismiss.
09/17/2020	CHR	0.20	17.00	85.00	Receipt, review and docket responses to Dorsey and PFP Dorsey Motions to Dismiss.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
09/17/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, regarding her review of Plaintiffs' joint response to the Defendants' respective Motions to Dismiss.
09/17/2020	EIR	0.20	33.00	165.00	Review communication from Stephanie Gintert, attorney for PFP Dorsey Investments LLC, regarding Plaintiffs' joint response to the Defendants' Motions to Dismiss and her belief a conference call is necessary to coordinate our responses thereto.
09/17/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, in response to Stephanie Gintert's communication regarding Plaintiffs' joint response to the Defendants' Motions to Dismiss and her agreement that a conference call is necessary to coordinate our responses thereto.
09/17/2020	EIR	0.20	33.00	165.00	Draft responses to the communications from Jennifer Barry, General Counsel Pathfinder, and Stephanie Gintert, attorney for PFP Dorsey Investments LLC, regarding Plaintiffs' joint response to the Defendants' Motions to Dismiss and a conference call is necessary to coordinate our responses thereto.
09/17/2020	EIR	1.20	198.00	165.00	Review Plaintiffs' Joint Response to the Defendants' Motions to Dismiss and begin to formulate arguments to counter Plaintiffs' position and arguments therein..
09/21/2020	EIR	0.60	99.00	165.00	Conference call with Jennifer Barry, General Counsel for Pathfinder, Defendants' parent company, and Stephanie Gintert, to discuss how best to address the Reply in support of the Association's Motion to Dismiss.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
09/21/2020	EIR	0.20	33.00	165.00	Draft communication to carriers to update them on the pending matter and the Defendants' Motion to Dismiss and upcoming conference call with Jennifer Barry, General Counsel for Pathfinder, to discuss the client's concerns regarding the reply in support of those Motions.
09/21/2020	NCN	3.70	536.50	145.00	Begin drafting reply in support of motion to dismiss
09/23/2020	NCN	1.90	275.50	145.00	Continue drafting reply in support of motion to dismiss
09/24/2020	CHR	0.40	34.00	85.00	Draft Notice of First Extension of Time to file Joint Reply to Motions to Dismiss on behalf of Dorsey Place and PFP Dorsey.
09/24/2020	NCN	1.80	261.00	145.00	Continue drafting reply in support of motion to dismiss, focusing on constitutionality argument with special focus on plaintiffs' failure to comply with statutory requirements to bring such a claim
09/24/2020	NCN	0.40	58.00	145.00	Teleconference with PFP counsel regarding strategy in responding to plaintiffs' arguments in response to motion to dismiss
09/25/2020	CHR	0.20	17.00	85.00	Prepare final draft of Notice of First Extension to File Reply to Motion to Dismiss.
09/25/2020	CHR	0.20	17.00	85.00	Prepare email correspondence to all counsel serving copy of Notice of First Extension to File Reply to Motion to Dismiss.
09/25/2020	NCN	0.20	29.00	145.00	Finalize notice regarding defendants' extension of time to file reply in support of motions to dismiss
10/01/2020	EIR	0.20	33.00	165.00	Review and respond to communication from Cheryl Kennedy regarding status of reply in support of the Association's Motion to Dismiss.
10/01/2020	EIR	0.20	33.00	165.00	Draft response to communication from Craig Cline, attorney for Plaintiffs, complaining about violation letter for his clients defacing Association property and threatening to blow up settlement because of same.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
10/01/2020	NCN	4.10	594.50	145.00	Complete draft of reply in support of motion to dismiss
10/02/2020	EIR	1.30	214.50	165.00	Revise proposed Reply in support of the Association's Motion to Dismiss to provide additional argument based upon the governing documents and to suggest additional support pursuant to Statute.
10/02/2020	EIR	0.40	66.00	165.00	Review proposed reply in support of PFP Dorsey's Motion to Dismiss to see if they make any arguments we might want to incorporate into our Reply.
10/02/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, on her comments regarding PFP's reply in support of the its Motions to Dismiss.
10/02/2020	EIR	0.20	33.00	165.00	Review explanatory communication from Stephanie Gintert, attorney for PFP Dorsey Investments LLC, regarding her client's reply in support of its Motion to Dismiss.
10/02/2020	NCN	3.30	478.50	145.00	Analysis of co-defendant's draft reply in support of motion to dismiss
10/05/2020	CHR	0.30	25.50	85.00	Prepare final draft of Reply in Support of Motion to Dismiss or in Alternative Motion for More Definite Statement and upload to Turbocourt.
10/05/2020	CHR	0.30	25.50	85.00	Prepare email correspondence to all counsel and serve Reply in Support of Motion to Dismiss or in Alternative Motion for More Definite Statement by Email and U.S. Mail.
10/05/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, regarding the Association's Reply in support of its Motion to Dismiss and her approval of same.
10/05/2020	EIR	0.20	33.00	165.00	Review communication from Stephanie Gintert regarding her draft Reply in support of PFP Dorsey Investments LLC's Motion to Dismiss.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
10/05/2020	NCN	2.20	319.00	145.00	Draft final revisions to reply in support of motion to dismiss
10/06/2020	CHR	0.20	17.00	85.00	Receipt and review of Defendant PFP Dorsey Reply in Support of its Motion to Dismiss.
10/07/2020	CHR	0.20	17.00	85.00	Download conformed copy of Dorsey's Reply in Support of Motion to Dismiss.
10/07/2020	EIR	0.20	33.00	165.00	Draft communication to both carriers with discussion on oral argument on the Association's Motion to Dismiss and the Reply in support thereof.
10/13/2020	CHR	0.20	17.00	85.00	Download conformed copy of Reply in Support of Motion to Dismiss or Motion for More Definite Statement.
10/14/2020	EIR	0.20	33.00	165.00	Draft communication to both carriers regarding the pending Motions to Dismiss and the Defendants' request for oral argument.
10/14/2020	EIR	0.20	33.00	165.00	Draft communication to Jennifer Barry, General Counsel for Pathfinder, regarding the pending Motions to Dismiss and the Defendants' request for oral argument.
10/14/2020	EIR	0.20	33.00	165.00	Review client's response to update on the outstanding request for oral argument on the Defendants' respective Motions to Dismiss.
10/15/2020	EIR	0.60	99.00	165.00	Review multiple filings from counsel for Plaintiffs applying to have default entered against all Defendants despite the fact that all of Plaintiffs' claims have been dismissed with prejudice.
10/15/2020	CHR	0.20	17.00	85.00	Telephone call with Court regarding setting oral argument on Motion to Dismiss.
10/16/2020	EIR	0.20	33.00	165.00	Review the Court's order regarding procedures expected for oral argument on the Defendants' respective Motions to Dismiss.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
10/16/2020	EIR	0.20	33.00	165.00	Draft communication to General Counsel for Pathfinder regarding pending matter and oral argument and considerations for same, including client attendance.
10/16/2020	EIR	0.20	33.00	165.00	Review communication from General Counsel for Pathfinder regarding pending matter and oral argument and her inquiries regarding additional considerations for same, including client attendance.
10/16/2020	EIR	0.20	33.00	165.00	Draft follow-up communication to General Counsel for Pathfinder regarding pending matter and oral argument and responding to her inquiries regarding considerations for same, including client attendance, with recommendations.
10/29/2020	EIR	1.40	231.00	165.00	Telephone conference with Laura McCaffrey and Frances Buckley of CNA regarding pending matter, pending Motions to Dismiss and the hearing on same, opportunities for settlement and the likelihood of same and related issues.
10/29/2020	EIR	0.20	33.00	165.00	Draft communication to carrier to recap the telephone discussion and memorialize the decision made therein.
11/17/2020	EIR	0.20	33.00	165.00	Review communication from the Court regarding how oral argument will be conducted.
11/23/2020	EIR	0.20	33.00	165.00	Draft communication to Jennifer Barry, General Counsel for Pathfinder, with further information and documentation for the upcoming hearing on Defendants' Motion to Dismiss.
11/25/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, with questions regarding information necessary for oral argument and whether we should meet prior to discuss.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
11/25/2020	EIR	0.20	33.00	165.00	Draft response to communication from Jennifer Barry, General Counsel for Pathfinder, with questions regarding information necessary for oral argument and whether we should meet prior to discuss.
11/27/2020	EIR	0.20	33.00	165.00	Review case file in order to prepare update to claims adjusters with recommendations.
11/27/2020	EIR	0.20	33.00	165.00	Draft communication to claims adjusters with update on pending matter, including providing copy of the Association's response to Petitioner's filing in the Office of Administrative Hearings in response to the Association's filing that the Office of Administrative Hearings does not have jurisdiction.
12/02/2020	NCN	2.20	319.00	145.00	Draft outline of oral argument in advance of hearing on motion to dismiss focusing on the impossibility of Plaintiffs' relief given the events that have taken place since the condominium was terminated
12/03/2020	EIR	0.20	33.00	165.00	Review communication from Stephanie Gintert, attorney for PFP Dorsey Investments LLC regarding coordinating the oral argument so there is no redundancy in either Defendant's argument.
12/03/2020	VJG	0.20	17.00	85.00	Communicate with Michael Shern, Opposing Counsel, regarding the production of documents and access to Dropbox.
12/03/2020	NCN	0.80	116.00	145.00	Multiple email communications with Dorsey Place counsel regarding oral argument strategy
12/03/2020	NCN	2.80	406.00	145.00	Draft oral argument outline, focusing on unreasonable result if plaintiffs' position regarding third party purchasers being necessary is given deference, considering the intent, purpose, and application of how condominium terminations occur

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
12/04/2020	NCN	2.50	362.50	145.00	Draft outline for oral argument on motion to dismiss, focusing on motion for more definite statement and the red herring of the Association acting as a trustee for Owners pursuant to 33-1228
12/08/2020	EIR	0.20	33.00	165.00	Review communication from Stephanie Gintert to Jennifer Barry, General Counsel for Pathfinder, regarding pending oral argument and how counsel will coordinate said argument to avoid duplicative arguments.
12/08/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for Pathfinder, with her comments on how counsel for the two defendants intend to argue their respective Motions to Dismiss.
12/08/2020	NCN	1.10	159.50	145.00	Prepare for oral argument on motion to dismiss by consulting with co-defense counsel and revising planned arguments accordingly
12/11/2020	EIR	0.20	33.00	165.00	Review communication from Stephanie Gintert, counsel for PFP Dorsey Investments LLC, to Jennifer Barry, General Counsel for Pathfinder, regarding how the Court will conduct the oral argument in light of COVID-19 restrictions.
12/11/2020	EIR	0.20	33.00	165.00	Review communication from Jennifer Barry, General Counsel for PFP Dorsey Investments LLC, to Stephanie Gintert, counsel for PFP Dorsey Investments LLC, regarding how the Court will conduct the oral argument in light of COVID-19 restrictions.
12/11/2020	NCN	2.80	406.00	145.00	Draft oral argument section regarding the correct interpretation of the plain language of 33-1228 and the faults in plaintiffs' constitutional argument, since terminations are creatures of contract as opposed to statutory

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
12/14/2020	NCN	2.30	333.50	145.00	Draft revisions to oral argument outline focusing on constitutionality arguments and the numerous red herrings in Plaintiffs' arguments
12/15/2020	EIR	1.10	181.50	165.00	Consider issues raised in Court hearing on Defendants' respective motions to dismiss and what the anticipated ruling might be and if adverse, whether taking the case to the Court of Appeals would be appropriate.
12/15/2020	EIR	0.30	49.50	165.00	Draft communication to carriers post-hearing on the Motion to Dismiss.
12/15/2020	NCN	2.90	420.50	145.00	Draft final revisions to oral argument outline, focusing on relief sought and application of undisputed facts to plain language of statute
12/15/2020	NCN	1.10	159.50	145.00	Represent Association at oral argument on MTD
12/15/2020	NCN	3.40	493.00	145.00	Draft MTD regarding Arizona Department of Real Estate case between the parties
12/16/2020	EIR	0.90	148.50	165.00	Review proposed Motion to Dismiss Haining Xia's Petition before the Office of Administrative Hearings on the grounds that the Office does not have jurisdiction because the condominium association no longer exists and because these parties already are in litigation before the Superior Court.
12/16/2020	ANB	0.40	34.00	85.00	Finalize Respondent's Motion to Dismiss. File with the OAH. Send to opposing party.
12/18/2020	EIR	0.20	33.00	165.00	Review the Court's decision granting both Defendants' respective Motions to Dismiss.
12/18/2020	EIR	0.20	33.00	165.00	Draft communication to both carriers forwarding the Court's decision and recommendations regarding same and discussion about possibility Plaintiffs' will appeal.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
12/18/2020	NCN	2.30	333.50	145.00	Analysis of ruling from Judge granting our motion to dismiss and next steps in litigation based on the same in order to properly advise the client and carrier
12/18/2020	NCN	0.80	116.00	145.00	Multiple email communications with PFP Dorsey's counsel regarding judge's ruling and anticipated next steps in resolving this matter
12/21/2020	ANB	0.30	25.50	85.00	Received an Answer from Plaintiff. Saved to file and emailed to docketing. Received ME from Court re response date of 12 28 20.
1/4/2021	NCN	4.00	580.00	145.00	Prepare for OAH Hearing; Teleconference with PFP Dorsey regarding options for seeking resolution
1/4/2021	EIR	0.60	99.00	165.00	Review pending matter before the Office of Administrative Hearings to decide how best to present the evidence, including objecting to the hearing going forward based on the grounds set forth in our Motion to Dismiss.
1/4/2021	EIR	0.20	33.00	165.00	Review ruling issues by Administrative Law Judge in the Office of Administrative Hearings that she will not address the Association's Motion to Dismiss until the hearing.
1/4/2021	ANB	0.40	34.00	85.00	Draft Declaration and Application for Attorney's Fees.
1/4/2021	ANB	0.30	25.50	85.00	Received Minute Entry for distribution.
1/5/2021	NCN	3.00	435.00	145.00	Draft prehearing memo; settlement emails; teleconference with PFP Dorsey counsel
1/5/2021	EIR	0.40	66.00	165.00	Review and revise proposed pre-hearing memorandum to the Administrative Law Judge to provide all of the exhibits we intend to use at the hearing and to put the issue of the Office of Administrative Hearings jurisdiction squarely in the record.
1/6/2021	MJM	1.10	93.50	85.00	Finalize Prehearing Memorandum.

Date	Attorney	Rev Hrs	Rev Amt	Rev Rate	Narrative
1/6/2021	VJG	0.30	25.50	85.00	Finalize the Respondent's Notice of Submission of Additional Exhibits in advance of the hearing scheduled for January 7, 2021.
1/6/2021	EIR	0.30	49.50	165.00	Review and revise proposed Application for Attorneys' Fees and Costs.
1/6/2021	EIR	0.20	33.00	165.00	Review and revise proposed Statement of Costs.
1/6/2021	EIR	0.30	49.50	165.00	Review and revise proposed affidavit in support of the Association's Application for Attorneys' Fees and Costs.
1/6/2021	EIR	0.20	33.00	165.00	Review and revise calculations to submit in support of the Association's Statement of Costs.
1/6/2021	EIR	0.30	49.50	165.00	Review and revise calculations to submit in support of the Association's Application of Attorneys' Fees and Costs.
1/7/2021	MJM	0.60	51.00	85.00	Draft Application for Attorneys' Fees and Costs.
1/7/2021	MJM	0.60	51.00	85.00	Draft Statement of Costs.
1/7/2021	MJM	0.60	51.00	85.00	Draft Notice of Lodging Proposed Form of Judgment.
1/7/2021	MJM	0.60	51.00	85.00	Proposed Form of Judgment.
1/7/2020	NCN	2.80	406.00	145.00	OAH Hearing
1/7/2021	EIR	0.70	115.00	165.00	Draft detailed communication to carriers bringing them up to speed on the hearing before the Office of Administrative Hearings.
		231.50	34,177.00		