

DECLARATION OF ERIC M. FRASER
IN SUPPORT OF APPLICATION FOR ATTORNEYS' FEES & COSTS

I, Eric M. Fraser, swear to the truth of the following facts, of which I have firsthand knowledge:

1. I am a member at the firm of Osborn Maledon, P.A. and am the lawyer at the firm most familiar with this case. I am also familiar with the firm's timekeeping and billing practices.

2. This declaration is made pursuant to ARCAP 21, and details in connection with Osborn Maledon the hours worked on this matter, those persons who worked on this matter, their position and experience at the firm, and the reasonableness of the time spent on behalf of Plaintiffs/ Appellants Jie Cao and Frazer Xia .

Timekeeping Practices, Generally

3. Osborn Maledon requires each attorney and paralegal to record his or her time in tenths of an hour, listing the client, matter, date, and task performed. This information is generally recorded on a daily basis in an electronic system.

4. This information is kept entirely in the course of the firm's business as a regular practice of the firm and is maintained in the firm's files.

The Present Application and Osborn Maledon's Work

5. In connection with this case, the Xias engaged Osborn Maledon to represent them on appeal. Osborn Maledon agreed to represent the Xias on a flat-fee basis, with an additional success fee if the Xias prevailed on appeal.

6. Osborn Maledon's engagement letters with the Xias cover three distinct portions of this appeal: (1) the appeal assessment, (2) the principal briefing and presenting oral argument, and (3) supplemental briefing.

7. Osborn Maledon was first engaged to perform an appeal assessment evaluating the likelihood of success of an appeal following the dismissal of their complaint for a flat fee of \$15,000.

8. Osborn Maledon was then engaged to draft the opening brief and reply brief, and to present oral argument for a flat fee of \$132,500, with a potential success fee of \$65,000, due "if the court of appeals in full or in part reverses, vacates, remands, or issues a similar disposition or order granting [the Xias] relief."

9. Finally, Osborn Maledon was engaged to draft the two supplemental briefs following this Court's March 17, 2022 order for a flat fee of \$30,500 with an additional potential success fee of \$30,000.

10. The fee arrangements were designed to shift some of the risk of a potential loss on appeal from the Xias to Osborn Maledon. If the Xias lost their appeal, Osborn Maledon would recover less than it did under a typical hourly or flat-fee arrangement.

11. Some work was also performed on an hourly basis, such as preparing this fee application.

12. Attached as Exhibit A is a spreadsheet compiled from the firm's billing system, which reflects the work performed on this matter in the Court of Appeals.

13. Following the Court's decision, the Xias have paid or will pay the firm \$279,674.00 for the representation before the Court of Appeals.

The Qualifications of the Law Firm, Lawyers and Paralegals

14. Those involved in representing the Xias at Osborn Maledon have recorded time spent and costs incurred on their behalf to document the services rendered in this matter. The qualifications and experience of those involved are as follows:

15. I am a member of the firm. I graduated with High Honors from the University of Chicago Law School, 2009, from which I also received an MBA that same year. I was a member of the Order of the Coif, and was a

Comment Editor for University of Chicago Law Review. I clerked for Judge Douglas H. Ginsburg on the United States Court of Appeals for the D.C. Circuit. My practice focuses on federal and state appeals. I am an Appellate Lawyer Representative to the Ninth Circuit Judicial Conference, the Immediate Past Chair of the Executive Council of the State Bar Appellate Practice Section, a contributing author to the *Arizona Appellate Practice Handbook*, a co-author of the monthly column “Appellate Highlights” for the *Arizona Attorney*, and a co-editor of the appellate blog AZAPP. My typical hourly rate for appellate matters is \$565. I had principal responsibility for this case, including substantial work on the briefing and presenting oral argument.

16. Thomas L. Hudson is also a member of the firm. He received a B.A. in Philosophy from Arizona State University in 1988 and graduated, *summa cum laude*, from the University of Arizona in 1992, where he was the Editor of the *Arizona Law Review*. Before joining the firm in 1996, he clerked for the Honorable William C. Canby, Jr. at the Ninth Circuit Court of Appeals. His practice focuses on state and federal court appeals. He is a past chair of the State Bar Appellate Practice Section, a contributing author to the *Arizona Appellate Practice Handbook*, and a previous co-author of the

monthly column “Appellate Highlights” for the *Arizona Attorney*. He is a member of the American Academy of Appellate Lawyers, and is listed in *The Best Lawyers in America*, Appellate Law and Commercial Litigation; and *Southwest Super Lawyers*, Appellate. Mr. Hudson assisted with strategy, briefing, and oral argument preparation in this matter. His typical hourly rate is \$625.

17. John S. Bullock is an associate of the firm. He graduated *cum laude*, from Harvard Law School in 2017. Before joining the firm, he clerked for Judge Mary M. Schroeder, U.S. Court of Appeals, Ninth Circuit, and before that, he clerked for Judge G. Murray Snow, U.S. District Court, District of Arizona. His practice focuses on public law issues and appeals in state and federal court. Mr. Bullock assisted in drafting the appeal assessment, drafting the principal briefing, oral argument preparation, and supplemental briefing. His typical hourly rate is \$290.

18. Hayleigh S. Crawford is a member of the firm. She graduated Order of the Coif and *summa cum laude*, from Arizona State University, Sandra Day O’Connor College of Law in 2014, and the University of Texas, in 2007. Before joining the firm in 2015, she clerked for Judge Mary M. Schroeder, U.S. Court of Appeals, Ninth Circuit. Her practice focuses on

commercial litigation. Ms. Crawford assisted in the initial assessment of the appeal. Her typical rate is \$345 per hour.

19. Heather Robles participated in the moot arguments for the Court of Appeals. Heather graduated *cum laude* from Arizona State Law School in 2020, and before joining the firm, clerked for Justice Ann Timmer, Arizona Supreme Court. Her typical rate is \$250.

20. Additionally, various paralegals including Michelle D. Burns and Robert C. Franks, assisted with this matter. The paralegals assisted with managing the appellate record, preparing the appeal briefs, and cite-checking and hyperlinking the briefs. Their typical hourly rates are \$215 per hour and \$185 per hour, respectively.

The Reasonableness of the Requested Fees.

21. The fees requested in this matter are reasonable for the quality of services and representation provided to the Xias, and are, in my opinion, at or below the amount that would be charged by other comparable firms in Phoenix.

The Reasonableness of the Fee Arrangement

22. For the appeal assessment, the Xias agreed to pay a flat fee of \$15,000 for a memorandum that contained in-depth analysis of the potential

arguments on appeal and the potential likelihood of success. On an hourly basis, the Xias would have paid \$23,636.50 for this assessment. This appeal assessment was more complicated than initially expected because of the complexity of the novel issues involved.

23. For the opening brief, reply brief, and oral argument, the Xias agreed to pay a flat fee of \$132,500, with a potential success fee of \$65,000. Under a flat fee arrangement, Osborn Maledon would have charged \$160,000. And on an hourly basis, the Xias would have paid \$159,742.50 for the firm's services.

24. For the supplemental briefing ordered on March 17, 2022, the Xias agreed to pay \$30,000 in a flat fee, with a potential success fee of \$30,000 dollars. Under a flat fee arrangement, Osborn Maledon would have charged \$45,000 dollars for these services. On an hourly basis, the Xias would have paid \$38,724.00 for that portion of the appeal.

25. Based on my familiarity with the scope and nature of the case, the complexity of the issues involved, the time spent on the matter, and the risk assumed by Osborn Maledon, the fee arrangement in this matter is, in my opinion, reasonable. The firm took on substantial risk, both in the flat-fee portion and in the success fee portion. On the flat-fee portion, the firm

took on the risk that the tasks would be more complicated than expected (as some of them were), and the firm would incur a loss as compared to an hourly arrangement. This arrangement gave certainty to the Xias about their fees and protected them from higher fees if the case turned out to be more complex than expected. On the success component, the firm took on the risk of an adverse outcome on appeal.

The Reasonableness of the Time

26. Osborn Maledon was responsible for the opening brief, the reply brief, and the two supplemental briefs, as well as arguing the matter before the Court of Appeals. The appeal involved novel constitutional issues related to private takings in Arizona and novel questions of statutory construction. Attached as Exhibit A is a spreadsheet that reflects the work performed on this matter in the Court of Appeals, along with a calculation of what the appeal would have cost at our hourly rates. This work would have, in my judgment, been undertaken by a reasonable and prudent attorney representing the Xias' interests.

27. Based upon my familiarity with the scope and nature of the case, and the complexity of the issues involved, the time spent on this matter is, in my opinion, reasonable and would have been undertaken by a reasonable

and prudent attorney to advance or protect the clients' interests in connection with this appeal.

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

Executed this 21st day of July, 2022.

/s/ Eric M. Fraser
Eric M. Fraser

EXHIBIT A

**Exhibit A
Time Report**

Xia, Haining / Dorsey Place Appeal (18817.1-4)

Date	Name	Hrs	Amt	Narrative
04/27/2021	Fraser, Eric M.	0.50	282.50	Participate in videoconference with client re appeal.
04/27/2021	Fraser, Eric M.	0.70	395.50	Review preliminary materials for appeal assessment.
04/29/2021	Crawford, Hayleigh S.	0.20	69.00	Confer with Eric Fraser re appeal assessment strategy and next steps.
04/30/2021	Crawford, Hayleigh S.	1.10	379.50	Review and analyze record in preparation for appeal assessment.
04/30/2021	Fraser, Eric M.	0.50	282.50	Emails with Frazer Xia re appeal assessment and trial counsel; call with Hayleigh Crawford re additional record items needed for assessment.
05/01/2021	Crawford, Hayleigh S.	0.40	138.00	Compile list of record items needed for appeal assessment and email Eric Fraser re same.
05/03/2021	Franks, Robert C.	0.70	129.50	Coordinate upload of various case pleadings and documents received by Frazier Xia.
05/03/2021	Fraser, Eric M.	0.50	282.50	Emails with Hayleigh Crawford and Frazer Xia re superior court documents and trial counsel.
05/04/2021	Fraser, Eric M.	0.20	113.00	Emails with opposing counsel and Frazer Xia re trial court record.
05/04/2021	Crawford, Hayleigh S.	0.10	34.50	Exchange emails with Eric Fraser re relevant appeal deadlines.
05/05/2021	Crawford, Hayleigh S.	0.30	103.50	Review background documents provided by client.
05/06/2021	Crawford, Hayleigh S.	0.10	34.50	Exchange emails re docketing.
05/08/2021	Crawford, Hayleigh S.	0.10	34.50	Email trial counsel re transcript order.
05/11/2021	Fraser, Eric M.	0.80	452.00	Videoconference with John Bullock re appeal assessment; emails with client re same; review file.
05/11/2021	Bullock, John S.	0.50	145.00	Videoconference with Eric Fraser regarding appeal assessment and exchange emails with Eric Fraser and Hayleigh Crawford regarding same.
05/11/2021	Bullock, John S.	2.80	812.00	Review all briefing and complaint, and other related documents and begin drafting memorandum.
05/12/2021	Fraser, Eric M.	0.20	113.00	Emails with client re transcripts.

Date	Name	Hrs	Amt	Narrative
05/12/2021	Bullock, John S.	1.80	522.00	Continue reviewing key documents, including powerpoint slides from client (.6); conduct research on condominium majority owner force outs of minority owners (1.2).
05/13/2021	Bullock, John S.	1.00	290.00	Research [REDACTED]
05/14/2021	Bullock, John S.	3.00	870.00	Continue outlining, drafting, and revising appeal assessment (2.0); conduct legal research on claims based on association by-laws and remedy for breach of fiduciary duty (1.0).
05/16/2021	Bullock, John S.	4.80	1,392.00	Continue drafting, researching, and revising appeal assessment.
05/17/2021	Bullock, John S.	0.30	87.00	Review bylaws and other documents in record.
05/17/2021	Bullock, John S.	0.20	58.00	Review transcript from oral argument with Judge Martin.
05/18/2021	Bullock, John S.	7.10	2,059.00	Complete draft appeal assessment and send to Eric Fraser.
05/19/2021	Fraser, Eric M.	2.40	1,356.00	Revise appeal assessment memo; telephone call with John Bullock re same.
05/19/2021	Bullock, John S.	1.10	319.00	Call with Eric Fraser regarding appeal assessment; begin revising appeal assessment in response to comments from Eric Fraser.
05/20/2021	Bullock, John S.	1.50	435.00	Conduct research on state constitutional takings of private property [REDACTED] (1.0); begin revising appeal assessment (0.5).
05/20/2021	Bullock, John S.	0.10	29.00	Exchange emails with Eric Fraser regarding call with trial counsel, review emails between Eric Fraser and trial counsel.
05/23/2021	Bullock, John S.	7.20	2,088.00	Conduct research on several issues relating to appeal (2.5); reorganize and substantially revise appeal assessment (4.7).
05/24/2021	Fraser, Eric M.	1.40	791.00	Review revised appeal assessment memo; call with trial counsel re appeal issues; follow-up call with John Bullock re same.
05/24/2021	Bullock, John S.	1.50	435.00	Complete revisions and review appeal assessment.
05/24/2021	Bullock, John S.	1.80	522.00	Call with Jack Wilenchik, Ross Meyer, and Eric Fraser regarding potential appeal (0.5); call with Eric Fraser regarding revised appeal assessment (0.6); revise appeal assessment to reflect discussions (0.7).
05/26/2021	Fraser, Eric M.	0.30	169.50	Emails with trial counsel re perfecting appeal; emails with John Bullock re appeal assessment.
05/26/2021	Bullock, John S.	1.00	290.00	Conduct brief research on partition actions in Arizona and revise appeal assessment.
05/27/2021	Fraser, Eric M.	0.20	113.00	Emails with John Bullock re appeal assessment.
05/28/2021	Fraser, Eric M.	1.20	678.00	Revise appeal assessment memo.
05/29/2021	Fraser, Eric M.	2.30	1,299.50	Revise appeal assessment memo.

Date	Name	Hrs	Amt	Narrative
05/29/2021	Bullock, John S.	1.80	522.00	Revise appeal assessment memo.
05/30/2021	Fraser, Eric M.	0.80	452.00	Revise, finalize, and send appeal assessment memorandum.
06/07/2021	Fraser, Eric M.	0.20	113.00	Emails with Ross Meyer and Jack Wilenchik re appeal.
06/10/2021	Fraser, Eric M.	0.70	395.50	Review email from Frazer Xia re appeal strategy; review analysis from John Bullock re same; email Frazer Xia re same.
06/10/2021	Bullock, John S.	1.80	522.00	Review materials and draft response to Frazer Xia regarding additional issues for appeal.
06/10/2021	Bullock, John S.	0.10	29.00	Exchange emails with Eric Fraser regarding response to Frazer Xia's comments on appeal assessment.
06/11/2021	Fraser, Eric M.	0.50	282.50	Emails with Frazer Xia and John Bullock re options for appeal; call with John Bullock re same.
06/11/2021	Bullock, John S.	1.50	435.00	Research and draft response to Frazer Xia's email.
06/11/2021	Bullock, John S.	0.20	58.00	Call with Eric Fraser discussing response to Frazer Xia's email.
06/14/2021	Fraser, Eric M.	0.50	282.50	Emails with Frazer Xia re strategy of which arguments to make on appeal.
06/15/2021	Bullock, John S.	0.50	145.00	Review complaint and documents to determine whether [REDACTED]
06/15/2021	Fraser, Eric M.	0.30	169.50	Emails with client re appeal strategy; call with John Bullock re same.
06/16/2021	Bullock, John S.	0.50	145.00	Review and analyze whether to include breach of fiduciary duty issue in appeal and send email thoughts to Eric Fraser regarding the same.
06/16/2021	Fraser, Eric M.	0.40	226.00	Analyze issue re fiduciary duty; emails with client re same; emails with John Bullock re same.
06/17/2021	Bullock, John S.	0.80	232.00	Conference with Eric Fraser about opening brief.
06/17/2021	Bullock, John S.	1.00	290.00	Outline areas for additional research (0.3); continue researching and reviewing Arizona case law on private takings (0.7).
06/17/2021	Fraser, Eric M.	1.70	960.50	Emails with clients re issues to appeal; meet with John Bullock re appeal strategy.
06/18/2021	Bullock, John S.	2.00	580.00	Continue researching cases and theory regarding private takings.
06/18/2021	Fraser, Eric M.	0.70	395.50	Prepare initial case documents, including substitution of counsel, extension request, and brief shell; email with trial counsel re substitution.
06/21/2021	Bullock, John S.	1.10	319.00	Review example brief from prior case (0.3); begin research [REDACTED]
06/21/2021	Fraser, Eric M.	0.80	452.00	Review notice of appearance from opposing counsel; revise substitution of counsel; email trial counsel re substitution; email John Bullock re briefing deadlines.
06/22/2021	Fraser, Eric M.	0.50	282.50	Prepare initial documents for appeal; emails with trial counsel re same; email clients re same.

Date	Name	Hrs	Amt	Narrative
06/23/2021	Fraser, Eric M.	0.90	508.50	Review email from Jie Cao re appeal strategy; draft letter re representation; finalize and file substitution of counsel and extension request; email opposing counsel re extension request; email trial counsel re substitution.
06/23/2021	Bullock, John S.	1.00	290.00	Review and analyze recent US Supreme Court decision on per se takings and update outline with additional analysis.
06/25/2021	Bullock, John S.	0.20	58.00	Call with Eric Fraser regarding Supreme Court decision.
06/25/2021	Fraser, Eric M.	0.20	113.00	Call with John Bullock re Supreme Court decision.
06/27/2021	Bullock, John S.	0.60	174.00	Continue researching property law restrictions on ability to sell or transfer at common law.
06/28/2021	Fraser, Eric M.	0.20	113.00	Review order granting extension; email clients re same.
06/29/2021	Bullock, John S.	0.20	58.00	Draft case management statement.
06/30/2021	Fraser, Eric M.	0.50	282.50	Revise case management statement.
06/30/2021	Bullock, John S.	0.80	232.00	Research [REDACTED]
06/30/2021	Bullock, John S.	0.20	58.00	Revise case management statement.
07/01/2021	Fraser, Eric M.	0.20	113.00	Email clients re case management statement; revise same.
07/02/2021	Bullock, John S.	0.20	58.00	Prepare notice of filing of transcript and corresponding certificate.
07/02/2021	Fraser, Eric M.	0.30	169.50	Review and revise notice of transcripts; call with John Bullock re briefing schedule.
07/04/2021	Bullock, John S.	3.40	986.00	Continue researching for and drafting opening brief.
07/04/2021	Bullock, John S.	1.90	551.00	Continue drafting opening brief.
07/05/2021	Bullock, John S.	2.20	638.00	Continue drafting opening brief.
07/05/2021	Bullock, John S.	1.20	348.00	Continue drafting opening brief.
07/07/2021	Fraser, Eric M.	0.30	169.50	Finalize and coordinate filing case management statement and transcript notice.
07/07/2021	Bullock, John S.	8.10	2,349.00	Complete draft argument section on takings for opening brief and continue revising other sections of brief.
07/08/2021	Fraser, Eric M.	3.10	1,751.50	Revise takings section of opening brief; telephone call with John Bullock re same.
07/08/2021	Bullock, John S.	0.50	145.00	Telephone conference with Eric Fraser regarding draft section of brief (0.5).
07/09/2021	Fraser, Eric M.	0.30	169.50	Emails with opposing counsel re service issue.
07/11/2021	Bullock, John S.	0.90	261.00	Continue research [REDACTED]
07/12/2021	Fraser, Eric M.	2.00	1,130.00	Identify potential amici; emails and telephone calls with potential amici; call with John Bullock re amici and emails with clients re amici.
07/12/2021	Bullock, John S.	5.10	1,479.00	Continue researching for and drafting opening brief.
07/12/2021	Bullock, John S.	4.10	1,189.00	Continue drafting opening brief.
07/12/2021	Bullock, John S.	0.30	87.00	Call with Eric Fraser regarding potential amicus and other issues relating to opening brief.

Date	Name	Hrs	Amt	Narrative
07/13/2021	Bullock, John S.	6.10	1,769.00	Continue drafting and revising brief (4.0); implement some changes to takings section suggested by Eric Fraser (1.2); review brief for typos and close read (0.9).
07/13/2021	Fraser, Eric M.	0.40	226.00	Coordinate amici.
07/14/2021	Fraser, Eric M.	2.60	1,469.00	Revise background and statutory argument section of opening brief.
07/15/2021	Bullock, John S.	1.10	319.00	Review and begin implementing edits from Eric Fraser to opening brief.
07/15/2021	Bullock, John S.	0.50	145.00	Call with Eric Fraser regarding opening brief.
07/15/2021	Fraser, Eric M.	3.90	2,203.50	Review and revise background and statutory argument section of opening brief; telephone call with John Bullock re same.
07/16/2021	Fraser, Eric M.	1.30	734.50	Call with Pacific Legal Foundation re amicus brief; email clients re amicus briefs; phone call with John Bullock re structure of opening brief.
07/16/2021	Bullock, John S.	0.50	145.00	Call with Eric Fraser regarding case status, brief, amicus participation, and questions for client.
07/16/2021	Bullock, John S.	0.20	58.00	Draft list of questions for client meeting next week.
07/16/2021	Bullock, John S.	0.30	87.00	Incorporate notes into draft statutory section on structure and review statute following conversation with Eric Fraser.
07/18/2021	Bullock, John S.	4.50	1,305.00	Continue revising and reworking section on takings.
07/19/2021	Bullock, John S.	1.30	377.00	Proofread and finalize section on takings and send to Eric Fraser.
07/20/2021	Fraser, Eric M.	3.50	1,977.50	Revise takings section of opening brief; email with PLF re amicus brief; call with John Bullock re takings section of brief.
07/20/2021	Bullock, John S.	0.60	174.00	Call with Eric Fraser regarding changes to takings section of opening brief; review Eric Fraser's comments and changes to same.
07/22/2021	Bullock, John S.	2.80	812.00	Revise draft takings brief section based on feedback from Eric Fraser.
07/22/2021	Bullock, John S.	0.30	87.00	Call with Eric Fraser regarding takings section of brief.
07/22/2021	Bullock, John S.	2.50	725.00	Revise factual background and standard of review sections to incorporate feedback from Eric Fraser.
07/22/2021	Fraser, Eric M.	0.60	339.00	Prepare for conference call with clients; confer with John Bullock re appeal.
07/23/2021	Fraser, Eric M.	4.60	2,599.00	Substantially revise background section and takings section, and draft introduction for opening brief.
07/27/2021	Fraser, Eric M.	0.90	508.50	Confer with John Bullock re strategy on opening brief and statutory argument; [REDACTED]
07/27/2021	Bullock, John S.	2.60	754.00	Continue revising statutory section of brief (2.1); call with Eric Fraser regarding [REDACTED] and statutory structure (0.5).
07/28/2021	Bullock, John S.	7.90	2,291.00	Substantially revise and add entire new section to statutory argument in brief, conduct additional legal research, review all comments to other sections from Eric Fraser and implement suggestions.

Date	Name	Hrs	Amt	Narrative
07/29/2021	Hudson, Thomas L.	1.90	1,187.50	Review and revise draft opening brief; conference with Eric Fraser re initial comments on same.
07/29/2021	Fraser, Eric M.	3.60	2,034.00	Revise all sections of amicus brief; telephone call with Thom Hudson re same.
07/30/2021	Hudson, Thomas L.	2.10	1,312.50	Further revisions/comments on draft opening brief and email correspondence with Eric Fraser re same and overall structural issues.
07/30/2021	Fraser, Eric M.	4.20	2,373.00	Substantially revise structure of statutory section of opening brief; call with John Bullock re additional research on takings issue.
07/30/2021	Bullock, John S.	0.90	261.00	Call with Eric Fraser discussing additional research topic areas (0.9).
07/31/2021	Hudson, Thomas L.	0.20	125.00	Email correspondence with Eric Fraser re further comments on draft brief concerning constitutional challenge and interpretive issue.
08/01/2021	Fraser, Eric M.	5.60	3,164.00	Research on takings issue and condominium statutes; revise statutory section and issues in opening brief.
08/01/2021	Bullock, John S.	1.40	406.00	Conduct research [REDACTED] (0.6) and [REDACTED] (0.8).
08/01/2021	Bullock, John S.	1.40	406.00	Research trustee issues for statutory section of opening brief.
08/02/2021	Hudson, Thomas L.	1.70	1,062.50	Review revised draft opening brief statement of facts and argument section on statutory issue and email correspondence with Eric Fraser re same.
08/02/2021	Fraser, Eric M.	4.00	2,260.00	Revise statutory section of opening brief; further research re trustee issue and re takings issue; telephone calls with Thom Hudson and John Bullock re same.
08/02/2021	Bullock, John S.	2.30	667.00	Continue researching duties of trustee in connection with sale of trust property (1.9); draft summary email to Eric Fraser with analysis of same (0.4).
08/02/2021	Bullock, John S.	2.90	841.00	Conduct research on partition [REDACTED]
08/02/2021	Bullock, John S.	0.40	116.00	Call with Eric Fraser discussing research on trustees.
08/03/2021	Hudson, Thomas L.	1.60	1,000.00	Review and revise opening brief constitutional argument section.
08/03/2021	Fraser, Eric M.	2.30	1,299.50	Revise takings section of opening brief; review and analyze research re partition actions and takings.
08/03/2021	Bullock, John S.	1.30	377.00	Conduct additional takings research about background rules and draft and send summary to Eric Fraser.
08/03/2021	Bullock, John S.	0.50	145.00	Continue researching on [REDACTED]
08/03/2021	Bullock, John S.	0.20	58.00	Call with Eric Fraser discussing brief.
08/04/2021	Hudson, Thomas L.	0.70	437.50	Conference with Eric Fraser re issues concerning draft opening brief and how best to proceed re same; review and revise latest draft section on statutory interpretation.

Date	Name	Hrs	Amt	Narrative
08/04/2021	Fraser, Eric M.	2.00	1,130.00	Call with Thom Hudson re opening brief; call with John Bullock re opening brief; revise opening brief in light of additional comments and research.
08/04/2021	Bullock, John S.	0.50	145.00	Review notes on [REDACTED] issue, briefing, and send analysis to Eric Fraser.
08/04/2021	Bullock, John S.	0.40	116.00	Call with Eric Fraser discussing changes to brief.
08/04/2021	Bullock, John S.	1.90	551.00	Make additional revisions to opening brief.
08/05/2021	Fraser, Eric M.	0.90	508.50	Revise opening brief in light of revisions from John Bullock; email clients re opening brief; exchange emails with potential amici.
08/06/2021	Fraser, Eric M.	0.10	56.50	Emails with client re meeting re opening brief.
08/09/2021	Fraser, Eric M.	1.20	678.00	Call with Pacific Legal Foundation re potential amicus brief; follow-up email to Pacific Legal Foundation; follow-up call with John Bullock; email [REDACTED]
08/09/2021	Bullock, John S.	0.50	145.00	Brief research on [REDACTED]
08/10/2021	Fraser, Eric M.	2.40	1,356.00	Meet with clients re opening brief; follow up with John Bullock re same; revise opening brief in light of client meeting.
08/10/2021	Bullock, John S.	1.20	348.00	Client meeting in the office (1.1); follow up conversation with Eric Fraser (0.1).
08/10/2021	Bullock, John S.	0.20	58.00	Review brief for factual inaccuracies following meeting with client.
08/11/2021	Burns, Michelle D.	3.00	645.00	Begin cite check of Opening Brief.
08/12/2021	Fraser, Eric M.	1.90	1,073.50	Review and implement cite check revisions; further revisions to opening brief; review and revise draft appendix index; emails with counsel for Pacific Legal Foundation re amicus brief.
08/12/2021	Bullock, John S.	0.50	145.00	Call with Michelle Burns regarding cite check for brief (0.1), locate sources for Michelle Burns (0.4).
08/12/2021	Bullock, John S.	0.50	145.00	Review comments from Michelle Burns and Eric Fraser in draft brief and resolve (0.4); exchange emails with Eric Fraser regarding the same (0.1).
08/12/2021	Burns, Michelle D.	0.90	193.50	Draft table of contents for appendix to opening brief.
08/12/2021	Burns, Michelle D.	5.30	1,139.50	Complete cite check of opening brief.
08/12/2021	Burns, Michelle D.	0.30	64.50	Telephone conference with John Bullock regarding sources for cite check.
08/13/2021	Bullock, John S.	0.10	29.00	Call with Michelle Burns regarding outstanding issues in brief.
08/13/2021	Burns, Michelle D.	1.00	215.00	Several phone calls and emails with IS Department regarding software issues and crashes during drafting of table of authorities.
08/13/2021	Burns, Michelle D.	3.20	688.00	Insert hyperlinks in opening brief and double-check and edit each one.
08/13/2021	Burns, Michelle D.	4.30	924.50	Draft, edit and finalize table of authorities for opening brief.
08/15/2021	Fraser, Eric M.	1.40	791.00	Revise opening brief to account for revisions from amici and cite check.

Date	Name	Hrs	Amt	Narrative
08/15/2021	Bullock, John S.	0.30	87.00	Review comments to brief from PLF and send thoughts to Eric Fraser regarding same.
08/16/2021	Fraser, Eric M.	4.60	2,599.00	Revise opening brief; revise appendix; add annotations to appendix; review revisions to table of authorities and from proofread.
08/16/2021	Bullock, John S.	0.20	58.00	Review notes from research on eminent domain and send treatises to Eric Fraser.
08/16/2021	Bullock, John S.	0.70	203.00	Proofreading and additional work on opening brief.
08/16/2021	Bullock, John S.	0.10	29.00	Exchange emails with and call with Michelle Burns regarding additional eminent domain sources.
08/16/2021	Burns, Michelle D.	0.40	86.00	Instructions to WP Dept. regarding combining and numbering documents for appendix.
08/16/2021	Burns, Michelle D.	0.30	64.50	Final update of table of authorities.
08/16/2021	Burns, Michelle D.	0.80	172.00	Revisions to appendix documents and table of contents
08/16/2021	Burns, Michelle D.	1.90	408.50	Revisions to opening brief table of authorities.
08/16/2021	Burns, Michelle D.	1.40	301.00	Excerpt documents for appendix and additional revisions to brief and table of authorities.
08/16/2021	Burns, Michelle D.	0.10	21.50	Telephone call with John Bullock re Eminent Doman treatise.
08/17/2021	Fraser, Eric M.	2.10	1,186.50	Coordinate filing brief and appendix; draft shortened bookmark headings; revise brief and bookmarks; emails with potential amici.
08/17/2021	Bullock, John S.	0.50	145.00	Test brief hyperlinks and internal cross references.
08/18/2021	Fraser, Eric M.	1.40	791.00	Finalize brief, appendix, and accompanying certificates and coordinate filing same; email opposing counsel re opening brief; email clients re opening brief; email potential amici re opening brief.
08/30/2021	Bullock, John S.	0.50	145.00	Review draft amicus brief and draft thoughts re: same to Eric Fraser.
08/30/2021	Fraser, Eric M.	0.40	226.00	Begin to review draft of amicus brief from Pacific Legal Foundation.
08/31/2021	Fraser, Eric M.	0.10	56.50	Email Pacific Legal Foundation re amicus brief.
8/31/2021	Westlaw		2,952.60	Westlaw Legal Research
09/08/2021	Bullock, John S.	0.50	145.00	Call with Eric Fraser regarding amicus brief from Pacific Legal Foundation.
09/08/2021	Fraser, Eric M.	0.60	339.00	Confer with John Bullock re amicus brief.
09/13/2021	Fraser, Eric M.	0.80	452.00	Email Pacific Legal Foundation re amicus brief.
09/13/2021	Bullock, John S.	0.20	58.00	Review and respond to Eric Fraser's draft email to amicus.
09/15/2021	Fraser, Eric M.	0.20	113.00	Emails with Frazer Xia re amicus briefs.
09/23/2021	Fraser, Eric M.	0.30	169.50	Email John Bullock re potential takings argument; review excerpt of brief re same.
09/28/2021	Fraser, Eric M.	2.20	1,243.00	Review and analyze answering brief; draft notes re same; call with John Bullock re same.
09/28/2021	Fraser, Eric M.	0.20	113.00	Draft extension motion; email opposing counsel re same.

Date	Name	Hrs	Amt	Narrative
09/28/2021	Bullock, John S.	2.40	696.00	Review and analyze answering brief, take notes on points for reply (1.2); call with Eric Fraser regarding opening brief (0.8); begin outline for reply brief (0.4).
09/29/2021	Fraser, Eric M.	0.80	452.00	Emails with clients re answering brief; email Pacific Legal Foundation re answering brief.
09/30/2021	Fraser, Eric M.	0.20	113.00	Emails with opposing counsel re extension on reply brief; finalize and coordinate filing motion for same.
10/03/2021	Bullock, John S.	1.60	464.00	Continue outlining and begin drafting reply brief (1.1); research on incorporation of statutes by reference (0.5).
10/05/2021	Fraser, Eric M.	0.30	169.50	Email Jie Cao re reply brief issues.
10/06/2021	Bullock, John S.	1.70	493.00	Research incorporation of unconstitutional statute into contract (1.1); continue revising brief (0.6).
10/06/2021	Fraser, Eric M.	0.20	113.00	Emails with Pacific Legal Foundation re amicus brief.
10/07/2021	Bullock, John S.	1.10	319.00	Conduct research on facial vs. as-applied challenges (0.5); continue revising reply brief (0.6).
10/08/2021	Bullock, John S.	3.30	957.00	Conduct additional research relating to facial vs. as-applied challenges as to takings claims and continue drafting reply brief.
10/10/2021	Bullock, John S.	1.50	435.00	Continue drafting and revising reply brief.
10/11/2021	Bullock, John S.	0.70	203.00	Continue revising reply brief.
10/12/2021	Bullock, John S.	4.30	1,247.00	Continue drafting and revising reply brief.
10/13/2021	Bullock, John S.	1.90	551.00	Conduct additional research regarding incorporation of unconstitutional statute, incorporation of statute that is subsequently amended or repealed.
10/13/2021	Bullock, John S.	6.40	1,856.00	Complete first draft reply brief.
10/14/2021	Bullock, John S.	0.50	145.00	Review and revise reply brief for typos, bluebooking, other stylistic changes.
10/14/2021	Fraser, Eric M.	1.70	960.50	Review and revise draft of taking section of reply brief.
10/15/2021	Fraser, Eric M.	2.50	1,412.50	Continue to revise reply brief; email John Bullock re same.
10/15/2021	Bullock, John S.	0.20	58.00	Call with Eric Fraser regarding revisions to reply brief (0.1); exchange emails with Eric Fraser regarding same (0.1).
10/18/2021	Bullock, John S.	2.10	609.00	Revise reply brief section on takings.
10/19/2021	Fraser, Eric M.	4.30	2,429.50	Revise statutory section of reply brief; confer with John Bullock re takings section of reply brief.
10/19/2021	Bullock, John S.	0.90	261.00	In office meeting with Eric Fraser regarding reply brief revisions.
10/19/2021	Bullock, John S.	1.50	435.00	Continue research on forfeiture, mechanic's lien, and special assessments (1.2); revise section (0.3).
10/20/2021	Fraser, Eric M.	3.50	1,977.50	Draft section of answering brief re trustee/fiduciary duties.
10/20/2021	Bullock, John S.	1.70	493.00	Continue revising takings section reply brief.

Date	Name	Hrs	Amt	Narrative
10/20/2021	Bullock, John S.	0.40	116.00	Call with Eric Fraser regarding reply brief.
10/21/2021	Bullock, John S.	0.40	116.00	Review Eric Fraser revisions to statutory section of reply brief and begin incorporating edits on same.
10/21/2021	Fraser, Eric M.	2.90	1,638.50	Review and revise section of reply brief re statutory construction.
10/22/2021	Fraser, Eric M.	0.40	226.00	Meet with [REDACTED] re potential amicus brief.
10/22/2021	Bullock, John S.	1.30	377.00	Continue revising takings section of reply brief.
10/22/2021	Bullock, John S.	1.20	348.00	Revise and draft statutory section of reply brief.
10/24/2021	Bullock, John S.	3.40	986.00	Revise statutory section of reply brief.
10/25/2021	Bullock, John S.	4.20	1,218.00	Substantially revise takings portion of reply brief.
10/26/2021	Fraser, Eric M.	1.30	734.50	Revise statutory section of reply brief.
10/26/2021	Bullock, John S.	0.60	174.00	Revise statutory section of brief.
10/28/2021	Bullock, John S.	1.80	522.00	Incorporate Eric Fraser's suggested revisions to statutory section, leave discussion comments.
10/28/2021	Fraser, Eric M.	0.70	395.50	Revise statutory construction section of reply brief.
10/29/2021	Fraser, Eric M.	1.00	565.00	Revise section of reply brief re constitutional issue.
10/30/2021	Fraser, Eric M.	7.00	3,955.00	Thoroughly revise all sections of reply brief.
10/31/2021	Fraser, Eric M.	0.30	169.50	Revise reply brief; email clients re same.
11/01/2021	Hudson, Thomas L.	2.10	1,312.50	Review answering brief; review draft reply brief; begin revising same.
11/01/2021	Burns, Michelle D.	0.20	43.00	Review email from John Bullock and forward statute to him.
11/02/2021	Hudson, Thomas L.	4.60	2,875.00	Conference with Eric Fraser re reply brief strategy issues; review and revise reply brief re same; email correspondence with Eric Fraser re same.
11/02/2021	Fraser, Eric M.	3.30	1,864.50	Revise all sections of reply brief, including editing for length and incorporating revisions from Thom Hudson.
11/03/2021	Fraser, Eric M.	4.10	2,316.50	Revise all sections of reply brief; telephone call with John Bullock re same; telephone call with Thom Hudson re same; exchange emails with client re same.
11/03/2021	Bullock, John S.	0.70	203.00	Review draft reply brief.
11/03/2021	Bullock, John S.	0.90	261.00	Call with Eric Fraser regarding outstanding issues with reply brief.
11/04/2021	Fraser, Eric M.	0.80	452.00	Revise reply brief, including incorporating cite check revisions; coordinate cite check; emails with counsel for amicus.
11/04/2021	Bullock, John S.	0.20	58.00	Conference with Michelle Burns regarding questions for cite check of reply brief.
11/04/2021	Burns, Michelle D.	5.80	1,247.00	Cite check Reply Brief.
11/05/2021	Fraser, Eric M.	0.50	282.50	Call with Pacific Legal Foundation re takings issue; follow up email with Pacific Legal Foundation re same.
11/05/2021	Fraser, Eric M.	1.00	565.00	Revise table of authorities, cross-references, and hyperlinks in reply brief; review proofread edits; coordinate finalizing brief.

Date	Name	Hrs	Amt	Narrative
11/05/2021	Bullock, John S.	0.30	87.00	Review brief for accuracy of internal cross references, other typos.
11/05/2021	Burns, Michelle D.	2.00	430.00	Insert hyperlinks and prepare table of authorities for reply brief.
11/05/2021	Burns, Michelle D.	0.20	43.00	Prepare Westcheck Report for reply brief.
11/05/2021	Burns, Michelle D.	0.40	86.00	Additional edits to table of authorities and hyperlinking.
11/07/2021	Fraser, Eric M.	0.30	169.50	Emails with Pacific Legal Foundation re reply brief.
11/08/2021	Fraser, Eric M.	1.40	791.00	Final revisions to reply brief; review and revise hyperlinks in same; emails with Pacific Legal Foundation re reply brief and amicus brief.
11/19/2021	Fraser, Eric M.	1.00	565.00	Review and comment on amicus brief.
11/23/2021	Fraser, Eric M.	0.20	113.00	Email clients re oral argument and amicus brief.
11/23/2021	Fraser, Eric M.	0.10	56.50	Review order granting oral argument.
11/23/2021	Fraser, Eric M.	0.30	169.50	Review email from opposing counsel re amicus consent; email counsel for amicus re same.
11/28/2021	Fraser, Eric M.	1.20	678.00	Review [REDACTED]; emails [REDACTED]
11/29/2021	Fraser, Eric M.	2.50	1,412.50	Emails [REDACTED]; review [REDACTED]
11/29/2021	Bullock, John S.	0.50	145.00	Call with Eric Fraser [REDACTED]
11/30/2021	Westlaw		1,708.00	Westlaw Legal Research
12/13/2021	Fraser, Eric M.	0.20	113.00	Review opposition to motion for leave to file amicus brief; email amicus counsel re same.
12/14/2021	Fraser, Eric M.	0.20	113.00	Emails with Pacific Legal Foundation re motion on amicus brief.
12/17/2021	Fraser, Eric M.	0.20	113.00	Review Pacific Legal Foundation's reply in support of motion for leave to file amicus brief.
12/20/2021	Fraser, Eric M.	0.10	56.50	Review order accepting amicus brief.
12/29/2021	Fraser, Eric M.	0.40	226.00	Review notice of oral argument; review backgrounds of judges; emails with client re same.
01/10/2022	Fraser, Eric M.	0.50	282.50	Review and analyze response to amicus brief; email clients re same.
01/11/2022	Fraser, Eric M.	0.20	113.00	Coordinate moot argument.
01/11/2022	Fraser, Eric M.	0.20	113.00	Emails with Pacific Legal Foundation re response to amicus brief.
01/12/2022	Robles, Heather A.	0.20	50.00	Meet with Eric Fraser to discuss upcoming moot.
01/12/2022	Fraser, Eric M.	0.30	169.50	Coordinate moot argument; videoconference with Heather Robles re moot argument.
01/26/2022	Fraser, Eric M.	0.10	56.50	Email counsel for amicus re response to amicus brief.
02/02/2022	Fraser, Eric M.	1.00	565.00	Coordinate moot argument; begin to prepare for argument by identifying key authorities.
02/02/2022	Bullock, John S.	0.50	145.00	Call with Eric Fraser regarding oral argument preparation and updating research.

Date	Name	Hrs	Amt	Narrative
02/04/2022	Bullock, John S.	0.90	261.00	Conduct supplemental research for upcoming oral argument and compile materials.
02/04/2022	Franks, Robert C.	1.30	240.50	Prepare oral argument authorities binder, compile briefings and coordinate hand-delivery; email exchange with Brenda Wendt and Eric Fraser re the same.
02/07/2022	Bullock, John S.	2.40	696.00	Continue conducting supplemental research for upcoming oral argument and send email to Eric Fraser summarizing same.
02/07/2022	Fraser, Eric M.	0.80	452.00	Emails with clients re oral argument; review updated research from John Bullock.
02/08/2022	Fraser, Eric M.	1.40	791.00	Begin to prepare for oral argument.
02/09/2022	Bullock, John S.	1.20	348.00	Review briefing and draft questions for moot argument.
02/09/2022	Fraser, Eric M.	4.30	2,429.50	Prepare for oral argument on taking issue and procedural history.
02/10/2022	Fraser, Eric M.	4.00	2,260.00	Prepare for oral argument on takings issue and notice to government officials.
02/11/2022	Fraser, Eric M.	2.20	1,243.00	Prepare for oral argument on constitutional taking issue, including statute requiring notice to government officials.
02/11/2022	Bullock, John S.	0.20	58.00	Research and respond to Eric Fraser email regarding origins of statute on termination of condominiums.
02/15/2022	Fraser, Eric M.	6.60	3,729.00	Prepare for oral argument on statutory issue.
02/15/2022	Bullock, John S.	0.30	87.00	Call with Eric Fraser regarding research for upcoming oral argument.
02/15/2022	Bullock, John S.	0.40	116.00	Research whether [REDACTED]
02/16/2022	Fraser, Eric M.	6.30	3,559.50	Prepare for oral argument on statutory construction issue; draft outline of introductory remarks; analyze fiduciary duty issue.
02/16/2022	Bullock, John S.	1.90	551.00	Research on [REDACTED]
02/16/2022	Bullock, John S.	1.00	290.00	Finish preparing questions for moot argument.
02/16/2022	Robles, Heather A.	5.00	1,250.00	Analyze briefing and cited case law in preparation for moot.
02/17/2022	Fraser, Eric M.	3.80	2,147.00	Prepare for and participate in moot argument.
02/17/2022	Bullock, John S.	1.70	493.00	Participate in moot argument.
02/17/2022	Robles, Heather A.	2.80	700.00	Analyze arguments in briefing and list questions to raise in moot (1.5); participate in moot (1.2); email notes and questions to Eric Fraser and John Bullock (.1).
02/17/2022	Hudson, Thomas L.	2.90	1,812.50	Prepare for and attend moot court.
02/20/2022	Fraser, Eric M.	9.50	5,367.50	Prepare for oral argument on all issues; review key authorities and briefing; identify potential questions and draft responses to same.
02/21/2022	Bullock, John S.	0.20	58.00	Call with Eric Fraser regarding upcoming oral argument.
02/21/2022	Bullock, John S.	0.70	203.00	Call with Eric Fraser regarding outstanding questions for oral argument.
02/21/2022	Bullock, John S.	0.80	232.00	Research and send findings to Eric Fraser on [REDACTED]

Date	Name	Hrs	Amt	Narrative
02/21/2022	Fraser, Eric M.	9.70	5,480.50	Prepare for oral argument.
02/22/2022	Fraser, Eric M.	3.00	1,695.00	Prepare for and present oral argument.
02/22/2022	Bullock, John S.	2.60	754.00	Travel to, attend and travel from oral argument.
02/22/2022	Bullock, John S.	0.20	58.00	Check composition of panel, emails with Eric Fraser regarding change to panel (0.2).
02/23/2022	Fraser, Eric M.	0.30	169.50	Confer with John Bullock re potential notice of supplemental authority.
02/23/2022	Bullock, John S.	0.30	87.00	Participate in teleconference with Eric Fraser regarding oral argument and [REDACTED]
02/27/2022	Fraser, Eric M.	0.50	282.50	Review and analyze video of oral argument.
03/01/2022	Fraser, Eric M.	0.20	113.00	Email [REDACTED]
03/01/2022	Fraser, Eric M.	0.20	113.00	Review new complaint filed against County Assessor's Office and email clients re same.
03/02/2022	Fraser, Eric M.	0.40	226.00	Coordinate [REDACTED]
03/04/2022	Fraser, Eric M.	1.10	621.50	Participate in videoconference with clients [REDACTED]; follow-up emails [REDACTED] re same.
03/17/2022	Fraser, Eric M.	1.40	791.00	Review and analyze order calling for supplemental briefing; confer with John Bullock re same; analyze different versions of statutes.
03/17/2022	Bullock, John S.	2.50	725.00	Review and analyze court order for supplemental briefing (0.6); call with Eric Fraser regarding the order (0.9); initial research on whether statutory amendments apply in a contract that incorporates statute by reference (1.0).
03/18/2022	Bullock, John S.	0.30	87.00	Call with Eric Fraser regarding [REDACTED], strategy for supplemental briefing.
03/18/2022	Fraser, Eric M.	0.30	169.50	Telephone call with John Bullock re supplemental briefing.
03/18/2022	Bullock, John S.	1.60	464.00	Additional research on amendments to documents incorporation by reference and analysis regarding same.
03/18/2022	Fraser, Eric M.	0.30	169.50	Telephone call and email from [REDACTED]
03/21/2022	Fraser, Eric M.	0.10	56.50	Review settlement terms from Frazer Xia.
03/22/2022	Fraser, Eric M.	0.30	169.50	Exchange emails with Kady Valois re supplemental brief.
03/22/2022	Fraser, Eric M.	0.30	169.50	Review and analyze new Supreme Court decision on CC&Rs.
03/23/2022	Fraser, Eric M.	6.00	3,390.00	Review order from court of appeals re new Supreme Court opinion; further analysis of Supreme Court opinion; draft section of supplemental brief re incorporation by reference.
03/23/2022	Bullock, John S.	0.30	87.00	Call with Eric Fraser regarding supplemental brief, research tasks.

Date	Name	Hrs	Amt	Narrative
03/23/2022	Bullock, John S.	0.30	87.00	Review and analyze supplemental authority order and recent Arizona Supreme Court case.
03/23/2022	Fraser, Eric M.	0.20	113.00	Exchange emails with Frazer Xia [REDACTED]
03/24/2022	Fraser, Eric M.	1.10	621.50	Draft section of supplemental brief re reasonable expectations.
03/24/2022	Bullock, John S.	1.70	493.00	Additional research on subsequent amendments to documents incorporated by reference into a contract.
03/25/2022	Fraser, Eric M.	4.80	2,712.00	Continue to draft supplemental brief, including sections on fiduciary duties, incorporation by reference, and 1986 version of statute.
03/25/2022	Bullock, John S.	0.30	87.00	Call with Eric Fraser regarding additional research topics.
03/28/2022	Bullock, John S.	1.00	290.00	Additional research on incorporation by reference issues.
03/29/2022	Bullock, John S.	0.70	203.00	Draft email to Eric Fraser with research summary and analysis.
03/30/2022	Fraser, Eric M.	4.00	2,260.00	Research and draft sections of supplemental brief on incorporation by reference and 2018 amendments.
03/30/2022	Bullock, John S.	0.60	174.00	Research on fiduciary duties issues.
03/31/2022	Fraser, Eric M.	3.10	1,751.50	Draft waiver section of supplemental brief; revise all sections of supplemental brief.
03/31/2022	Bullock, John S.	1.90	551.00	Additional research on fiduciary duties issues.
04/01/2022	Fraser, Eric M.	3.40	1,921.00	Telephone call with John Bullock re supplemental brief strategy; draft sections of supplemental brief re waiver and fiduciary duties.
04/01/2022	Bullock, John S.	0.50	145.00	Call with Eric Fraser regarding additional research topics, analysis for supplemental brief.
04/01/2022	Bullock, John S.	1.90	551.00	Additional research regarding fiduciary duties issues.
04/03/2022	Bullock, John S.	1.30	377.00	Research on waiver of constitutional rights.
04/03/2022	Bullock, John S.	1.20	348.00	Draft and send email to Eric Fraser summarizing research on waiver of constitutional rights and likely answers to the questions from the Court by Dorsey Investments.
04/05/2022	Bullock, John S.	3.60	1,044.00	Additional research regarding fiduciary duties owed to trust beneficiary in connection with a sale of trust property.
04/06/2022	Fraser, Eric M.	1.20	678.00	Research trustee obligations.
04/06/2022	Bullock, John S.	0.50	145.00	Research regarding [REDACTED]
04/07/2022	Bullock, John S.	0.40	116.00	Additional review and analysis of case law on condominium associations owing fiduciary duties.
04/08/2022	Bullock, John S.	2.10	609.00	Complete research [REDACTED]

Date	Name	Hrs	Amt	Narrative
04/11/2022	Fraser, Eric M.	4.30	2,429.50	Continue to research, draft, and revise supplemental brief, with particular focus on fiduciary duties, presumptions, and incorporation by reference; telephone call with John Bullock re same; exchange emails with Jie Cao re supplemental brief.
04/11/2022	Bullock, John S.	0.60	174.00	Review and revise supplemental brief.
04/12/2022	Fraser, Eric M.	1.50	847.50	Exchange emails with Jie Cao re supplemental brief; revise supplemental brief for word count issue; review revisions to supplemental brief from John Bullock.
04/12/2022	Bullock, John S.	0.90	261.00	Revise draft supplemental brief.
04/13/2022	Burns, Michelle D.	3.70	795.50	Cite check Supplemental Brief.
04/13/2022	Burns, Michelle D.	1.10	236.50	Prepare and edit table of authorities for supplemental brief.
04/13/2022	Burns, Michelle D.	1.20	258.00	Insert Westlaw hyperlinks and check functionality of each.
04/13/2022	Fraser, Eric M.	5.00	2,825.00	Revise supplemental briefs for word count; coordinate and implement cite check and table of authorities revisions; thorough review of supplemental brief and revisions in light of same; call with John Bullock re supplemental brief strategy; emails with clients re additional statute.
04/13/2022	Bullock, John S.	0.20	58.00	Call with Michelle Burns regarding cite check to supplemental brief.
04/13/2022	Bullock, John S.	0.50	145.00	Call with Eric Fraser regarding supplemental brief.
04/14/2022	Fraser, Eric M.	1.70	960.50	Review proof of supplemental brief; draft shortened section headings; review hyperlinks; final revisions to brief; review and revise accompanying documents.
04/14/2022	Bullock, John S.	0.50	145.00	Proof supplemental brief and check links therein.
04/15/2022	Fraser, Eric M.	0.00	0.00	
04/15/2022	Fraser, Eric M.	0.90	508.50	Finalize and file supplemental brief; review defendants' supplemental brief.
04/15/2022	Bullock, John S.	0.00	0.00	
04/17/2022	Bullock, John S.	0.70	203.00	Review and analyze Dorsey Place supplemental brief and take notes regarding same.
04/18/2022	Fraser, Eric M.	0.70	395.50	Confer with John Bullock re strategy on response to supplemental brief; further analyze supplemental brief; email clients re same.
04/18/2022	Bullock, John S.	0.40	116.00	Draft and send analysis of Dorsey supplemental brief to Eric Fraser.
04/18/2022	Bullock, John S.	0.50	145.00	Call with Eric Fraser regarding response to supplemental brief.
04/19/2022	Fraser, Eric M.	6.80	3,842.00	Research and draft response to defendants' supplemental brief.
04/20/2022	Fraser, Eric M.	1.00	565.00	Revise response to supplemental brief.
04/20/2022	Fraser, Eric M.	0.40	226.00	Phone conference with [REDACTED]
04/25/2022	Fraser, Eric M.	2.10	1,186.50	Revise supplemental brief.
04/25/2022	Fraser, Eric M.	0.90	508.50	Participate in Zoom call [REDACTED]
04/26/2022	Fraser, Eric M.	0.40	226.00	Revise response to supplemental brief; coordinate cite check of same.

Date	Name	Hrs	Amt	Narrative
04/26/2022	Bullock, John S.	0.80	232.00	Review Defendants supplemental brief and draft response, emails with Eric Fraser regarding same.
04/26/2022	Bullock, John S.	0.30	87.00	Call with Eric Fraser regarding supplemental brief.
04/27/2022	Fraser, Eric M.	1.00	565.00	Review and revise cite check, table of authorities, and hyperlinks in response to supplemental brief.
04/27/2022	Burns, Michelle D.	0.40	86.00	Insert and check Westlaw hyperlinks in response to additional briefing.
04/27/2022	Burns, Michelle D.	1.20	258.00	Cite check Response to additional briefing.
04/27/2022	Burns, Michelle D.	0.40	86.00	Draft table of authorities for Response to additional briefing.
04/29/2022	Fraser, Eric M.	0.60	339.00	Proofread and finalize response to supplemental brief.
4/30/2022	Westlaw		3,496.50	Westlaw Legal Research
05/01/2022	Fraser, Eric M.	0.20	113.00	Review bookmarking and hyperlinking of response to supplemental brief.
05/01/2022	Bullock, John S.	0.20	58.00	Conduct final review of supplemental brief.
05/02/2022	Fraser, Eric M.	0.80	452.00	Review certificate for response to supplemental brief and coordinate filing of same; review and analyze defendants' response to supplemental brief.
05/02/2022	Bullock, John S.	0.20	58.00	Emails and phone calls coordinating filing of brief.
05/03/2022	Fraser, Eric M.	0.20	113.00	Email clients re responses to supplemental briefs.
05/03/2022	Bullock, John S.	0.20	58.00	Review and analyze supplemental briefing from Dorsey.
6/30/2022	Westlaw		709.10	Westlaw Legal Research
07/08/2022	Bullock, John S.	1.10	319.00	Draft declaration for Eric Fraser in support of attorneys' fees application.
07/08/2022	Bullock, John S.	0.30	87.00	Call with Geoff Sturr regarding fee application.
07/12/2022	Bullock, John S.	2.20	638.00	Research regarding attorneys' fees application, begin outlining same.
07/12/2022	Bullock, John S.	0.50	145.00	Review and analyze Arizona handbook on attorneys' fees, research cases regarding same.
07/12/2022	Bullock, John S.	0.80	232.00	Review billing statements and make proposed redactions regarding same in connection with fee application.
07/16/2022	Bullock, John S.	1.50	435.00	Continue drafting and revising fee application.
07/17/2022	Bullock, John S.	2.7	783	Research on fee arrangements (1.6); additional drafting of fee application materials (1.1).
07/18/2022	Bullock, John S.	1.40	406.00	Revise and finalize initial draft of fee application (1.2); additional emails with Eric Fraser, Thom Hudson, and Michelle Burns regarding the same (0.2).
07/19/2022	Burns, Michelle D.	0.20	43.00	Telephone call with John Bullock regarding help with fee application and exhibits.
07/19/2022	Burns, Michelle D.	1.20	258.00	Compile and prepare time entries spreadsheet and cost entries spreadsheet to be exhibits.
07/19/2022	Bullock, John S.	1.40	406.00	Call with Michelle Burns and emails regarding spreadsheet exhibit (0.3); revise draft declaration and fee application 1.1).

Date	Name	Hrs	Amt	Narrative
07/20/2022	Bullock, John S.	1.30	377.00	Call with Eric Fraser regarding fee application (0.4); additional revisions to fee application (0.6); begin drafting statement of costs (0.3).
07/21/2022	Bullock, John S.	0.90	261.00	Finalize all materials for fee application.
07/21/2022	Burns, Michelle D.	0.90	193.50	Cite check Application for Fees and Declaration of Eric M. Fraser.
		550.00	237,643.20	